

**AUSTRALIAN ANIMAL WELFARE
STANDARDS AND GUIDELINES
FOR
CATTLE**

**Public Consultation Response
Action Plan
May 2014**

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EXECUTIVE SUMMARY

This document is based on summarised public consultation submissions received for the draft Standards and Guidelines for Cattle (March 2014) and the associated Consultation Regulation Impact Statement (RIS). This document identifies where there is a need or a desire for change in the standards and guidelines and if agreed, how this might be accomplished. It follows the format of the proposed standards and guidelines where possible. Specific issues are presented in the context of; background information of relevance (the proposed standards), submissions, considerations (including cross reference to the Consultation Regulation Impact Statement) and proposed actions.

Acknowledgment is given to Ms Kelly Wall, Animal Health Australia Project Officer and Dr Robin Vandegraaff of *Animal Health and Welfare Systems* who performed the initial analysis and summary of the submissions. This document initially functioned as a comprehensive summary and analysis of submissions for the cattle writing and reference groups and will now be published as a record of decisions and recommendations made at the final cattle reference group meeting. Tracked changes to standards and guidelines have been preserved to illustrate changes proposed or accepted.

Sixty substantial submissions have been published relating to the draft cattle standards and guidelines and the Regulation Impact Statement. These have been analysed and are reported on in this document. 1,566 on-line surveys have also been completed with results reported against relevant topics. In addition approximately 20,250 email letters have been received, of which the vast majority supported notions of better welfare standards.

Submitters will not be responded to directly. Only organisational submissions are identified in this report unless there is particular merit in the individual's submission. Submissions published or quoted are listed at Appendix one.

It has not been possible to generally recognise individual submissions in this report. In all cases the concerns raised by individuals have been also raised by organisations, and therefore the issues have been identified in this report. Acknowledgement is generally given to the degree of interest and effort that has gone into these submissions and in particular, the ongoing contributions of RSPCA Australia and Animals Australia throughout the development process.

The (proposed) categorisation and handling of issues identified in the public consultation is described. The four main decision-making principles used for standards are that they are desirable for livestock welfare, feasible for industry and government to implement important for the livestock-welfare regulatory framework and will achieve the intended outcome for livestock welfare.

The combined writing groups for cattle and sheep considered a summary analysis of the many detailed submissions to the public consultation of the draft standards and guidelines for cattle and sheep.

They then closely considered the draft documents and decided there were only minor changes required on the basis of the justification provided.

There was recognition of prior process where many of the issues had been comprehensively considered in previous writing and reference group meetings. It was decided not to further update the discussion papers used in the public consultation process.

Reference group discussions determined that there was little justification needed, with limited science or no scientific practical basis in response to the submissions. A small number of edits were made, including ensuring the language is consistent across the documents.

A number of draft guidelines were proposed for elevation to standards; however these were generally not progressed because they failed to meet one or more of the decision making principles.

This approach was generally supported by the reference group but consensus was not reached on all issues, including on the major variations proposed in the RIS. It was decided to proceed independently with all RIS variations in the Decision RIS for a total of nine options.

SUMMARY OF RIS VARIATIONS AND RECOMMENDATIONS

RIS Variation	Recommendation as a new standard	Recommendation as a RIS Variation	Comment
C1: pain relief for all spaying	Not supported	Supported	See Chapter 6 for further discussion
C2: banning flank spaying/flank webbing	Not supported	Supported	See Chapter 6 for further discussion
C3: banning permanent tethering	Not supported	Supported	See Chapter 5 for further discussion
C4: banning the use of dogs on calves	Not supported	Supported	See Chapter 5 for further discussion
C5: banning caustic dehorning	Not supported	Supported	See Chapter 6 for further discussion
C6: banning induction of early calving except for veterinary requirements	Not supported	Supported	See Chapter 7 for further discussion
C7: banning electro-immobilisation.	Not supported	Supported	See Chapter 5 for further discussion

The public consultation process resulted in one new standard, revision to 15 standards and 20 guideline revisions or inclusions. The overall recommendation from the reference group to governments is to consider endorsement of the documents based on the revised proposed standards and guidelines.

Kevin de Witte
Animal Health Australia,
May 2014

DOCUMENT PURPOSE

This document provides a summary of the invited comments and submissions received during the five month public consultation period for the draft Australian Animal Welfare Standards and Guidelines for Cattle and the associated Consultation RIS, and the subsequent consideration of these documents by the cattle writing and reference groups.

This document also identifies any recommendation for change in the standards and guidelines resulting from the public consultation process and proposes to government how this might be accomplished. Associated documents are the revised Australian Animal Welfare Standards and Guidelines for Cattle and the Decision RIS.

The Australian Animal Welfare Standards and Guidelines for Cattle ('the proposed standards') form the basis for legally enforceable standards for the welfare of all cattle, in all types of farming enterprises in Australia. The standards will apply to all those with responsibilities for the care and management of cattle. It is intended that the proposed standards and guidelines will replace the existing Model Code of Practice for the Welfare of Animals – Cattle ('the existing code').

The development of nationally consistent animal welfare arrangements for various industry sectors has been identified as a major priority by all levels of government, industry and welfare organisations. In addition it was a key policy objective under the Australian Animal Welfare Strategy (AAWS). The AAWS identified enhanced national consistency in regulation and sustainable improvements in animal welfare based on science, national and international benchmarks and changing community standards as areas of priority effort.

The RIS process assessed the proposed standards in accord with the requirements of the Council of Australian Governments. The RIS was also used to facilitate public consultation on the proposed standards. The RIS was prepared for AHA by Tim Harding & Associates in association with Rivers Economic Consulting.

Major actions from the consultation development process are summarised in the executive summary. Detailed discussion on all actions arising from the public consultation can be found in the relevant part of this document.

CONSULTATION PROCESS

An open public consultation ran from 7 March – 5 August 2013. Government ministers directed that consultation be extended from the agreed 60 days for a further 90 days just before the initial closure.

Media releases from AHA occurred prior to and during the consultation period. Paid advertisements were placed in all large regional newspapers and one major weekend newspaper just prior to 7 March 2013. At that time, the reference group organisations (government, industry and welfare) were asked to duplicate and disseminate the

prepared messages through their own networks and resources. Organisations were encouraged to consult with their members and to maintain a log of all related activities. AHA provided updates on the AHA website and on the website where the consultation occurred www.animalwelfarestandards.net.au.

Three categories of submission were received: substantial written documents, part or full completion of an online survey, with or without additional comments and email letters, many in a similar format. AHA preferred respondents to forward written comments electronically. Submissions were made via the website, email, fax or post. An online web based survey was available at the following site:
<http://www.animalwelfarestandards.net.au>.

All submissions are treated as public documents. Substantial submissions from organisations and individuals are published on the website www.animalwelfarestandards.net.au.

INDEPENDENT CONSULTANT

Dr Robin Vandegraaff of *Animal Health and Welfare Systems* was contracted to independently examine and summarise written and on-line survey submissions to the public consultation process for the Australian Animal Welfare Standards and Guidelines for Cattle. Robin's report made observations, conclusions and recommendations to AHA for consideration by the writing and reference groups.

MAJOR WRITTEN SUBMISSIONS - CONTENTIOUS AND POPULAR ISSUES

General comments in the public submissions, unrelated to specific standards or guidelines, contained some common themes. They were:

1. Criticism (mostly by welfare advocates and lawyer groups) of the use of "general" standards and subjective terms such as "reasonable", "adequate" and "appropriate" – covered under 'language and construction' below;
2. Concern (mostly in livestock industry organisations) about the capacity and commitment of government regulatory authorities to monitor and enforce compliance, and the consistency of enforcement by states and territories;
3. The practical difficulties in compliance with pain relief, veterinary procedures and age limits in remote pastoral production systems;
4. Concern and mistrust in some industry groups about the potential for courts to prosecute on the basis of failure to comply with guidelines – covered under 'scope' below;
5. The perceived lack of specificity (by welfare advocates) in some standards and their preference for adopting guidelines as standards;

The most controversial issues related to individual draft standards were:

1. Pain relief for surgical procedures - castration, dehorning, spaying of cattle (S6.2, 6.4, 6.5, 6.7 and 6.8);
 - mandate irrespective of age (all animal welfare and animal rights groups, some academic groups)
 - mandate at any age is impractical (many producer groups, including major national and northern Australian cattle producer groups)
2. Availability of water daily (S2.1) – non-acceptance of “reasonable access”;
3. The absence of a mandate for provision of shelter under Sections 2, 4 or 10;
4. Use of electric prodders (S5.3) – proposals/demands for prohibition;
5. Electro-immobilisation (S5.7);
 - calls to prohibit or mandate competency (welfare advocates)
 - strong defence as a management and welfare aid (industry groups, scientists)
6. Induction of calving (S7.3);
 - restrict to “necessary for welfare” only (welfare groups)
 - retain as an essential management practice in dairy cattle (industry, veterinarians)
7. Permanent tethering (S5.6) – calls for prohibition;
8. Hot-iron branding (S5.9 and G5.24);
 - calls to either prohibit or mandate analgesia (welfare groups)
 - strong defence as an essential management tool (northern cattle producers)
9. Slaughtering of calves by head trauma (S11.5);
 - age too difficult to confirm/audit
 - S11.1 not achieved by head trauma anyway

These issues were highlighted most frequently in written submissions and/or characterised by an “agreement” rate of less than 70%, attracting the greatest number of comments in the on-line survey. Further discussion on these topics occurs within this document as relevant in each chapter below.

ON-LINE SURVEY

The on-line survey sought responses on each of the 53 draft standards - specifically, whether or not the standard would benefit the welfare of cattle – and on 33 questions raised in the RIS.

There were 1,566 responses to the online survey. An average of 920 (59%) provided a response on the welfare standards. The survey has been criticised for its low value, length and the confusing nature of the questions but is still supported by some survey respondents as a means of consultation. The overall view was that the survey has added little to the overall process, with views expressed being consistent with other material and no new emerging facts.

Of the 53 survey questions seeking a response on the overall benefit of the standards, 45 returned a rating of “agree” or “strongly agree” of 70% or higher, including 21 rating 80% or higher. The generic question, Q3 “Will the cattle welfare standards help protect the welfare of cattle?” returned the lowest approval rating, with 33% “agree” or “strongly agree”, and 55% “disagree” or “strongly disagree”. This is an interesting outcome, considering the high “agreement rating for the majority of individual standards.

Seven draft standards returned an “agreement” rating of less than 70% - they were

- S5.7 – electro-immobilisation
- S5.9 – identification methods – hot-iron branding in particular
- S6.2 – pain relief for castration
- S6.4 – pain relief for dehorning
- S6.5 – use of caustic chemicals for disbudding
- S7.4 – treatment of induced calves and
- S11.5 – killing of calves by head trauma.

The large number of comments made by respondents on these questions generally reflected the views presented in written submissions, the only apparent difference being in relation to S6.5 which received more attention in the survey.

Generic question Q3: Will the cattle welfare standards help protect the welfare of cattle?

No. of responses	% Agree	% Disagree	% Neutral	No. of comments
1122	33	55	12	435

Comments:

The 435 comments fell into 8 categories. The following table gives the percentage of comments by category in a sample of 100 responses.

Category	Number of comments
Won't help – most already complying	6
Won't help – some key requirements not mandated	17
May help but not strong/specific enough	24
Will help if properly enforced	11
May help but education essential / better	2
Won't help – won't be enforced	2
Welcome – sufficient / overdue	4
Informal (did not address the question)	34
TOTAL	100

Q4: Is the first of several directional questions throughout the survey asking “Do you wish to answer questions or provide further comment on the cattle welfare standards?” The respondent would then be taken to the relevant section of the survey.

Q5: Will S1.1 - "A person must take reasonable actions to ensure the welfare of cattle under their care", help protect the welfare of cattle?

No. of responses	% Agree	% Disagree	% Neutral	No. of comments
1057	70	24	6	413

It is not intended to publish further detail for the survey, except in relation to the RIS.

EMAIL LETTER SUBMISSIONS

Approximately 20,250 email letters have been received, of which the vast majority supported better welfare standards. In many cases objections to specific standards or practices were raised but few new alternatives to achieve improved cattle husbandry outcomes were proposed. Many email submissions sought to compare the treatment of livestock with that of urban companion animals.

The majority of concerns focused on daily access to water, shelter/shade provisions and pain relief for all surgical procedures. Many submissions raised concerns that the standards and guidelines for cattle will not protect cattle from cruelty by allowing workers to strike animals and use electric prodders and electro-immobilisation.

Submissions expressed concern that dairy cows can still be subjected to calving induction, considered by some submitters to be dangerous and unnecessary.

Email submissions repeatedly stated that cattle are just as capable of feeling pain and fear as any other animal and alleged that the standards do not reflect the growing community concern about animal welfare, or the values society holds about how these animals should be treated.

Numerous submissions reflected concern about perceived costs to farmers and suggested that if costs were reduced, farmers could provide better welfare. E.g. *“More and more our farmers are seeing their marginal profits squeezed out of them by Coles and Woolworths... so every cent has to be gleaned from somewhere... goodbye animal welfare”*.

REGULATION IMPACT STATEMENT

Background

A key aspect to creating animal welfare standards is to identify the costs and benefits that the proposal will have for a wide range of stakeholders. This is typically done by preparing a RIS, as required by Council of Australian Governments (COAG), to assist final decision making state and territory by governments.

A RIS is then prepared by the department, agency, statutory authority or board responsible for a regulatory proposal. The RIS for the standards and guidelines for cattle has been developed by AHA in conjunction with the reference group. The RIS makes recommendations the most effective and efficient option, formalises and documents how authorities have assessed the costs, benefits and the possible changes to an existing (or a new) regulation. There are a number of assumptions and limitations recognised in this complex and lengthy document. In general terms, the RIS is accepted to be sufficiently accurate for the intended purpose as a guide to decision making.

Authorities are required to conduct public consultation to seek feedback and determine the level of support for the RIS. When the RIS is assessed, it must include a consultation statement that shows how consultation was undertaken, who was consulted and a summary of their views, and how those views were considered. The RIS consultation summary will be based upon this document.

Importantly the RIS considered alternative options and variations to the standards in terms of costs and benefits. These were:

- **Option A:** Converting the proposed national standards into national voluntary guidelines (the minimum intervention option);
- **Option B:** The proposed national standards as currently drafted;
- **Option C:** One or more variations of the proposed national standards as follows:

C1: Pain relief for all spaying

- C2: Banning flank spaying/flank webbing
- C3: Banning permanent tethering
- C4: Banning the use of dogs on calves
- C5: Banning caustic dehorning
- C6: Banning induction of early calving except for veterinary requirements
- C7: Banning electro-immobilisation.

The reference group agreed that all nine options and variations would be retained for final consideration. No new variations were supported. A unanimous recommended option could not be agreed. Further detail is provided below in the specific issues by chapter sections.

RIS Submissions

Of the 1,566 respondents, to the on-line survey; only approximately 100 went on to answer the specific RIS questions which were towards the end of the survey. These limited results indicated no clear picture for the preferred options, and indicated general support for all of the RIS variations under Option C to be considered. Very few informative comments were made. No further variations were supported. Further specific details will be reported in the Decision RIS and are provided in the relevant chapters.

Copies of the substantial submissions are available at;
<http://www.animalwelfarestandards.net.au/cattle/submissions/>

In general terms 17 **animal welfare/rights groups** supported Option C (variations C1-C7) as presented in the RIS; in addition several suggested further variations. For example Voiceless proposed additional variations - banning all dehorning and mandating pain relief for all surgical procedures. These proposals are discussed in the relevant chapters. No further variations were supported.

Of the 26 **Cattle industry organisations** (notably CCA, Northern Pastoral Company Group, AgForce and ALRTA) and many individual producer submissions generally supported Option B and opposed all the variations. AgForce expressed further reservations about relevance and accuracy the RIS and the feasibility of pain relief standards. AMIC, ALPA and ALFA supported the proposed standards and the RIS and did not pass comment on any of the variations. While broadly stating their support for the standards and their opposition to all variations, DA, ADF, UDV, Norco, QDO, WAFF (Dairy) and Far North Coast Dairy Industry Group submissions all presented specific arguments against variations C4, C5 and C6 because of their direct application to dairy cattle. While opposing variation C6, Fonterra suggested nationally agreed targets to reduce the rate of calving induction, modelled on an MOU operating in New Zealand. WAFF's separate submission included specific opposition to

variations C1, C2 and C7. The TFGA indicated specific opposition to variations C4, C5 and C6.

AgForce Cattle Queensland expressed strong concerns about the RIS: *“AgForce Cattle questions the relevance and accuracy of the RIS as a tool to gauge impacts given that throughout the document it acknowledges its inherent flaws and inability to capture accurate data. AgForce Cattle has not addressed the consultation questions in the RIS for this reason. Acquiring this data is a significant undertaking and should not be at the behest of industry.” “AgForce Cattle suggests that more time is taken to properly investigate the feasibility and cost of proposed measures within the RIS as the current document does not reflect the status quo or base case.”*

NSW Farmers supported Option A because it was *“not convinced that an additional layer of regulation will actually improve animal welfare outcomes as intended. The vast majority of producers already ensure that the welfare of animals in their care is upheld and for the minority of cases where this does not occur there is already legislation, the Prevention of Cruelty to Animals Act, which can be used to enforce minimum standards.”* NSW Farmers stand on the standards and guidelines implies opposition to the RIS variations but NSW Farmers emphasised specific opposition to C5, C6 and C7. Pastoralists and Graziers Association WA (PGA WA) and Livestock SA also supports voluntary guidelines only.

The NTCA’s submission generally indicated support for Option A, reflecting its satisfaction with the existing Model Codes of Practice and its over-riding view that many of the draft standards (in particular those requiring age definition for pain relief) are impractical and likely to fail. The NTCA also indicated opposition to all variations except C5 (on which they had no comment). The NTCA provided estimates in response to a few of the RIS public consultation questions (Q2, Q18-19, and Q22 - 23).

Tasmanian Farmers and Graziers Association (TFGA) supported Option B with some conditions relating to competent enforcement and use of dogs on calves. TFGA does not support variations C4, C5 & C6 and did not comment on the other variations.

The AVA submission was an assemblage of individual veterinary submissions to the AVA. In general there was support for Option B with concerns expressed that the supply of pain relief drugs must be retained under veterinary control.

The South Coast and Tablelands Regional Livestock Health Committee (SCTRLHC a NSW rural veterinary group) supported Option B and variations C1, C3, C4 and C5. The Warrnambool Veterinary Group (15 veterinarians, serving 250 dairy farms in western Victoria) made a comprehensive submission defending the draft standards and guidelines in relation to calving induction and rejecting variation C6.

Many industry organisations made the point that their industry’s continuing support for the standards and guidelines is dependent on successful harmonisation of state and territory welfare legislation.

The five **Government submissions** received generally supported the proposed national standards (Option B) with some variations. Governments have otherwise indicated support for national standards throughout the development process.

The Queensland Government (DAFF) submission took issue with aspects of the RIS, suggesting some imbalance and omissions in the benefit cost analyses, over estimation of the costs and omission of key benefits (e.g. of training dogs and effective control of dogs, improved competency of trained spayers and resultant animal production benefits from more expert spaying) and inadequate coverage of government costs. There is implied support of all variations. Variation C1 in QLD DAFF submission stated that the benefits of pain relief for all spaying have been ignored in the RIS. There is also support for variation C2 (based on incomplete analysis in the RIS of costs and benefits of flank spaying/webbing), C3 (based on failure to comply with one of the five freedoms) C4, on the basis of inconsistency with Land Transport Standards and lack of complete benefit-costs data, C5 caustic disbudding is not required, C6 induction is not required in Queensland and C7 in that electro-immobilisation is probably not justifiable.

The Victorian DEPI supported variation C1 on the basis that it is a vet only procedure in Victoria, C4, on the basis of inconsistency with the Land Transport Standards and C7 because electro-immobilisation is banned under POCTA. Variation C6, Victorian DEPI support adoption of alternative practices and phasing out of calving induction.

The Northern Territory Department of Primary Industry and Fisheries (NT DPIF) supported Option B and the variations except for C2 ban on flank spaying and C7, ban on electro-immobilisation. Some of these variations are of low relevance to the NT DPIF as there is no dairy industry there.

The Tasmanian Department of Primary Industries, Parks, Water and Environment did not indicate a preference for an Option whilst supporting the standards with some qualifications relating to existing law in Tasmania (vet only pain relief over 6 months, vet only electro-immobilisation) and revisions to other standards.

NSW Department of Primary Industries supports the development of national livestock standards and guidelines and is committed to their implementation into regulation once they are finalised and endorsed. The issue of muzzling of working dogs has been raised as a concern and has received careful consideration.

The SA, WA, and ACT Governments made no formal submissions to the public consultation process, presumably on the grounds that they had all had opportunity to provide comment during the drafting stage. Those in this group with significant cattle populations had previously expressed full support for Option B.

Some written submissions made specific comments on statements and assumptions in the RIS. For example the RSPCA Australia expressed concern that *“the RIS does not appear to take into account the extent to which compliance costs can be internalised and passed on through the supply chain. The costs of higher welfare options proposed in the RIS are all attributed to ‘cattle farmers’ alone. The RIS appears to play down the ability of cattle farmers to internalise these costs simply on the basis that ‘the market*

share for other animal welfare-related products indicates that only a small percentage of consumers would be likely to be influenced in their purchasing decisions. This ignores the steady year-on-year increase in demand and market share for higher welfare products, and subsequently, distorts the perception of how the economic impacts may be distributed”.

The few written submissions containing specific technical comment on statements and assumptions in the RIS were referred to Tim Harding and Associates for consideration in the RIS.

RIS options organisational position summary table

RIS Options supported	Organisation
Support Option A	NSWFF, NTCA, Livestock SA, PGA WA,
Support Option B (often with qualifications)	Most governments with further comments in text above. QDAFF, Vic DEPI, NSW, NT DPIF, CCA, Northern Pastoral Company Group, AMIC, ALPA, AgForce, ALRTA, ALFA, AVA, TFGA. DA-ADF, UDV, Norco, QDO, WAFF (Dairy), Fonterra and Far North Coast Dairy Industry Group.
Support Option B variation C1	SCTRLHC, QDAFF, Vic DEPI, NT DPIF
Support Option B variation C2	QDAFF
Support Option B variation C3	SCTRLHC, QDAFF, NT DPIF
Support Option B variation C4	SCTRLHC, QDAFF, Vic DEPI, NT DPIF
Support Option B variation C5	SCTRLHC, QDAFF, NT DPIF
Support Option B variation C6	QDAFF, NT DPIF
Support Option B variation C7	Vic DEPI, QDAFF
Support Option C (all variations)	Animal welfare/rights groups from 17 organisations including Animals Australia and RSPCA.

Summary of On-line survey RIS questions

The on-line survey included a number of questions raised in the RIS, most (Q1-4 and Q14-33) sought views and advice of interested parties in providing information and data that would further assist in the assessment of the impacts (costs and benefits) expected under each of the options/variations proposed in the RIS. The remainder of questions related to the RIS (Q5-13) sought preferences for Options A, B and C.

In reference to the total of 1,566 survey responses, RIS related questions Q5-13 (relating to Options A, B and C variations) were answered by an average of 95 (6%) of respondents. The remaining RIS related questions (Q1-4 and Q14-33), seeking more specific information, were answered by an average of 29 (2%) of respondents. Little useful data was received.

Below is a synopsis of the questions and the public responses to them. In general, only a small proportion of survey participants answered the RIS related questions. It is difficult to attach any significance to this small volume of responses for some questions. There was little confidence that the sample was representative of the population and there is a high risk of bias. A much larger number (986) felt that the survey had given them sufficient information and allowed them to comment adequately.

On-line survey RIS options

Q83: Which variations to the cattle welfare standards should be adopted?

Variation	% of responses	No. of Responses
C1 (pain relief for spaying)	50.51%	100
C2 (ban flank spaying and webbing)	46.46%	92
C3 (ban tethering)	43.94%	87
C4 (ban use of dogs on calves)	42.93%	85
C5 (ban caustic dehorning)	45.45%	90
C6 (ban induction calving)	43.94%	87
C7 (ban electro-immobilisation)	45.96%	90
None	15.15%	30
All	55.05%	109
Total Respondents:		198

Q84: Which option provides the best combination of costs and benefits?

Answer Choices	% of	No. of
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	responses	Responses
Option A	25.49%	26
Option B (the proposed standards)	25.49%	26
Option B with Variation C1 (pain relief with spaying)	18.63%	19
Option B with Variation C2 (banning flank spaying and webbing)	4.90%	5
Option B with Variation C3 (banning tethering)	0.98%	1
Option B with Variation C4 (banning the use of dogs on calves)	3.92%	4
Option B with Variation C5 (banning caustic dehorning)	5.88%	6
Option B with Variation C6 (banning induction of early calving)	3.92%	4
Option B with Variation C7 (banning electro-immobilisation)	10.78%	11
Total		102

On-line survey questions related to the RIS process

Q94: The RIS has adequately demonstrated the need for the proposed cattle welfare standards?

No. of responses	Agree	Disagree	Neutral
108	56%	27%	17%

Q95: The RIS has fully identified the costs of the proposed cattle welfare standards?

No. of responses	Agree	Disagree	Neutral
100	34%	33%	33%

Q96: The RIS has fully identified the benefits of the proposed cattle welfare standards?

No. of responses	Agree	Disagree	Neutral
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104	38%	34%	28%
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Q97: The RIS has fully identified the range of stakeholders affected by the proposed cattle welfare standards?

No. of responses	Agree	Disagree	Neutral
100	36%	31%	33%

Q98: Do you have any general comments relating to the RIS?

Summary of responses

There were 62 survey responses which related to positions on pain relief, importance of welfare and complexity of the RIS. Those with direct relevance to the question were taken into consideration in the development of RISs for future standards and guidelines.

Survey questions relating to the public consultation process

The final section of the on-line survey comprised a series of questions seeking views about the public consultation process undertaken by AHA. A summary of tabulated responses and comments is presented below.

Q99: Where did you hear about this public consultation process?

Answer Choices	Responses % and No.
Via an organisation that I belong to.	47.52% 479
Via an email or letter from AHA.	7.94% 80
Via the media.	7.74% 78
Via the internet.	32.54% 328
Other - please provide details in comments at the end.	4.27% 43
Total	1,008

Q100: Have you previously participated in any consultation process relating to cattle welfare or the cattle welfare standards?

Answer Choices	Responses % and No.
Yes	12.40% 125
No	87.60% 883
Total	1,008

Q101. Which of the following best describes what area you live in?

Answer Choices	Responses %
Rural	39.38%
Urban	31.25%
Metropolitan	29.37%
Total	1,008

Q102. What State/Territory do you reside in?

Answer Choices	Responses %	
ACT	1.98%	20
NSW	23.51%	237
NT	1.88%	19
Overseas	4.86%	49
QLD	22.82%	230
SA	9.62%	97
TAS	2.88%	29
VIC	23.61%	238
WA	8.83%	89

Total	1,008
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Q103. What occupation describes your main area of work or interest in relation to cattle welfare?

Answer Choices	Responses % and by No.	
Cattle producer	9.74%	96
Other livestock producer	0.61%	6
Livestock industry	2.43%	24
Livestock agent	0.1%	1
Veterinarian	1.42%	14
Animal welfare or animal rights organisation	22.11%	218
Training provider	0.91%	9
Researcher	3.75%	37
Student	7.51%	74
Total		479

Q104. This survey was easy to understand and complete?

No. of responses	Agree	Disagree	Neutral
986	71%	10%	19%

Q105. I believe the information provided to me as part of this survey helped me comment on the cattle welfare standards and the RIS?

No. of responses	Agree	Disagree	Neutral
986	69%	8%	23%

Q106. This survey helped me communicate my views about the draft cattle standards and the RIS?

No. of responses	Agree	Disagree	Neutral
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986	78%	5%	17%
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Q107. How would you recommend AHA consult for future Draft Australian Animal Welfare Standards and Guidelines for Cattle and RIS?

Answer Choices	Responses % and by No.	
Online questionnaire	77.46%	708
Hard copy questionnaire	3.28%	30
Written submission	4.05%	37
Telephone survey	3.83%	35
Other - please provide further details in comments at end.	5.69%	52
Don't know	5.69%	52
Total	914	

The pattern of responses probably reflects the demographic responding to the on-line survey.

Q108: Do you have any general comments relating to the consultation process and how it might be improved?

There were 370 responses to this question. A sample of 193 (52%) was allocated into 8 categories. The results for the sample responses are given below.

Category	% of responses	No. of responses
Publicise more widely	42%	82
Biased toward industry	1%	2
Style, language, definitions	4%	7
Good process or "No"	15%	29
Include Guidelines	0.5%	1
Target the questions at experts	0.5%	1
Too complex / long	3%	5

Informal (did not address the question)	34%	65
TOTAL		193

The “publicise more widely” category was characterised by complaints from respondents that they “found out about the process by accident” and that advertising and promotion of the process was limited and even “hidden” from key community groups and farmers. It included several suggestions for greater public exposure to the consultation process, including television advertising, Facebook page, other interactive (electronic) forums (e.g. Skype), public meetings and even to individual mail out livestock producers.

In the “Style, language and definitions” category, most respondents sought simpler “laymen’s” language and better definition of terms used in the standards and guidelines and the survey questions.

The “Informal” category included a variety of critical and/or partisan statements unrelated to the consultation process.

Actions

The few written submissions containing specific technical comment on statements and assumptions in the RIS were referred to Tim Harding and Associates for consideration in the RIS. Little new usable data or argument was made available during the consultation process. The major exception to this has been in relation to the cost of pain relief delivery for castration and dehorning across northern Australia. The underlying methodology of the RIS will not be revised. The RIS has not been revised in light of changes to any standards as proposed below in this report as these do not have a cost impact. At this time there are no additional cost impacts acknowledged. Full details are available in the Decision RIS.

INTERNATIONAL STANDARDS

Comparisons to other countries cattle welfare standards was not identified as a significant issue. Further country by country discussion is provided in the consultation RIS (section 1.2.3.5) and is not provided in this document. Global developments by the World Organisation for Animal Health (OIE) and the International Organisation for Standardization (ISO) are discussed here.

The 178 countries of OIE endorsed animal welfare guiding principles for livestock at its General Assembly in 2012. These are published in the **OIE International Animal Health Code. Article 7.1.4.**¹

¹ http://www.oie.int/index.php?id=169&L=0&htmfile=chapitre_1.7.1.htm

Eleven general principles for the welfare of animals in livestock production systems:

1. Genetic selection should always take into account the health and welfare of animals.
2. Animals chosen for introduction into new environments should be suited to the local climate and able to adapt to local diseases, parasites and nutrition.
3. The physical environment, including the substrate (walking surface, resting surface, etc.), should be suited to the species so as to minimise risk of injury and transmission of diseases or parasites to animals.
4. The physical environment should allow comfortable resting, safe and comfortable movement including normal postural changes, and the opportunity to perform types of natural behaviour that animals are motivated to perform.
5. Social grouping of animals should be managed to allow positive social behaviour and minimise injury, distress and chronic fear.
6. For housed animals, air quality, temperature and humidity should support good animal health and not be aversive. Where extreme conditions occur, animals should not be prevented from using their natural methods of thermo-regulation.
7. Animals should have access to sufficient feed and water, suited to the animals' age and needs, to maintain normal health and productivity and to prevent prolonged hunger, thirst, malnutrition or dehydration.
8. Diseases and parasites should be prevented and controlled as much as possible through good management practices. Animals with serious health problems should be isolated and treated promptly or killed humanely if treatment is not feasible or recovery is unlikely.
9. Where painful procedures cannot be avoided, the resulting pain should be managed to the extent that available methods allow.
10. The handling of animals should foster a positive relationship between humans and animals and should not cause injury, panic, lasting fear or avoidable stress.
11. Owners and handlers should have sufficient skill and knowledge to ensure that animals are treated in accordance with these principles.

Professor David Fraser and others have developed a scientific paper that informed these OIE general principles. It was published in the *Veterinary Journal*² in June 2013.

²David Fraser, Ian J.H. Duncan, Sandra A. Edwards, Temple Grandin, Neville G. Gregory, Vincent Guyonnet, Paul H. Hemsworth, Stella M. Huertas, Juliana M. Huzzey, David J. Mellor, Joy A. Mench, Marek Špinko, Rebecca Whay. *General Principles for the welfare of animals in production systems: The underlying science and its application*. The Veterinary Journal 198 (2013) 19–27.

The Australian Animal Welfare Standards and Guidelines for Cattle are consistent with these principles.

The OIE released in 2013 the Terrestrial Animal Health Code, Chapter 7.9. Animal Welfare and Beef Cattle Productions Systems. The chapter covers beef cattle production systems defined as all commercial cattle production systems where the purpose of the operation includes some or all of the breeding, rearing and finishing of cattle intended for beef consumption. The chapter addresses the welfare aspects of beef cattle production systems, from birth through to finishing. The scope does not include veal production. Outcome-based measurable indicators of welfare are suggested. Current work includes development of standards for dairy cattle, working animals (equids), animals in disasters and collation of resources.

The Terrestrial Code contains science-based recommendations for disease reporting, prevention and control and for assuring safe international trade in terrestrial animals (mammals, birds and bees) and their products. The recommendations do not contain mandatory standards consistent with the diverse needs of the 178 member countries. The Australian Animal Welfare Standards and Guidelines for Cattle are consistent with these recommendations.

ISO³ is a world-wide federation of national standards bodies. The ISO 26000, are internationally accepted standards on social responsibility for all organisations, public, private or third sector. ISO 26000:2010 provides guidance rather than requirements, so it cannot be certified to unlike some other well-known ISO standards. Instead, it helps clarify what social responsibility is, helps businesses and organizations translate principles into effective actions and shares best practices relating to social responsibility, globally.

Although ISO standards are voluntary, they are highly sought after as a certification standard. These standards stipulate what organisations need to do in order to state that they operate in a socially responsible manner – organisations that carry the ISO 26000 certification will be recognisable as having incorporated animal welfare in everything they do.

Specifically, the newly published 2010 text requires "respecting the welfare of animals, when affecting their lives and existence, including by providing decent conditions for keeping, breeding, producing, transporting and using animals".

The ISO standards also make specific mention in several chapters of the physical and psychological wellbeing of animals. Animal welfare has been integrated into actions governing ethical behaviour, consumer issues and community involvement as well as development, specifically in wealth and income creation. It is considered that the Australian Animal Welfare Standards and Guidelines for Cattle are consistent with these recommendations.

³ <http://www.iso.org/iso/home/standards/iso26000.htm>

General issues

General issues including scope, language construction, definitions, consistency in legislation, monitoring and enforcement of the standards independence and credibility of the standards development process, decision making, post consultation process and future communication have been discussed comprehensively during the development process. Some are outside the scope of this particular development process but may be relevant to the planned revision of the Standards and Guidelines Development Business Plan for all future livestock welfare projects.

SCOPE – RELATIONSHIP BETWEEN THE STANDARDS AND GUIDELINES

The cattle standards and guidelines document is a dual purpose document. It is intended to provide a basis for developing laws and also a basis for industry quality assurance programs. The intended wide readership requires that a plain English approach be used. Various concerns about the role of the guidelines are acknowledged.

The standards are the animal welfare requirements that will become law. Standards use the word 'must'.

The guidelines are the recommended practices to achieve desirable animal welfare outcomes. Guidelines use the word 'should'. Noncompliance with one or more guidelines will not constitute an offence under law.

The guidelines are not written to describe how to achieve these standards, instead they describe a better welfare position than the standard. The overall philosophy is that the private sector has the prime responsibility for livestock welfare and that this document will provide a basis for determining acceptable practices with the guidelines pointing towards best practice. This development process has created an opportunity for all three sectors of stakeholders to work together to develop or refine agreed industry guidelines on a regional or national basis and to focus research investment on contentious issues.

There is a lack of direct market mechanisms to drive uptake of better cattle welfare practice. Prosecution against the regulations is the option of last resort. Industries are expected to have shared ownership of the standards and guidelines and champion their uptake through education and engagement and to foster a culture of best practice and continuous improvement.

The position taken by Primary Industries Ministerial Council (PIMC) 15, in May 2009, is that guidelines, regardless of their purpose in existing Codes and the new standards and guidelines documents, will not be regulated.

In particular agreement was reached that:

“All future revisions of Model Codes and ‘Australian standards and guidelines’ documents must provide a number of:

- a) clear essential requirements (‘standards’) for animal welfare that can be verified and are transferable into legislation for effective regulation, and
- b) guidelines, to be produced concurrently with the standards but not enforced in legislation, to be considered by industry for incorporation into national industry QA along with the standards.

From the interpretation section of the introduction in the proposed Australian Animal Welfare Standards and Guidelines for Cattle:

- *Standards — the animal welfare requirements designated in this document (i.e. the requirements that must be met under law for livestock welfare purposes). The standards are intended to be clear, essential and verifiable statements. However, not all issues are able to be well defined by scientific research or are able to be quantified. Science cannot always provide an objective or precise assessment of an animal’s welfare and, consequently, where appropriate science is not available, the standards reflect a value judgement that has to be made for some circumstances. Standards use the word ‘must’. They are presented in a box and are numbered with the prefix ‘S’. The use of hyperlinks in the standards indicate a defined term.*
- *Guidelines — the recommended practices to achieve desirable animal welfare outcomes. Guidelines use the word ‘should’ and complement the standards. Noncompliance with one or more guidelines will not constitute an offence under law.*

Use of defence clauses is not considered to be an advantage for the regulatory system and has not been used. It is acknowledged that suggestions for restructure of the standards and guidelines have been made but it is not intended to make any structural change at this time.

The standards do not relate to transport or the live export of livestock. Recommendations in relation to land transport, ships, aircraft or the live export process are not addressed in this report.

General standards – language and construction

The dual purpose nature of the draft standards and guidelines for cattle and the plain English approach used, means that the document has a broader extension value to the cattle industry and community than just the creation of regulations. The draft standards and guidelines for cattle contains standards that are general and outcomes based or are detailed and prescriptive, or a mixture of the two types. The value of the general standards has been agreed by the majority of the reference group.

General standards are written because the complexity of biological systems means that it is impossible to develop standards which anticipate all circumstances that could have adverse outcomes or account for regional or environmental differences. The use of general standards has been minimised as it is recognised that they create a need for further explanation or interpretation.

The use of general, non-prescriptive standards creates a dilemma for regulators and industry. Animal welfare activists believe that this approach promotes the retention of current, unacceptable practices. Specifically, there are concerns about the use of common usage terms such as 'effective, reasonable, at the first reasonable opportunity, appropriate, and adequate, which have not been and are not intended to be, specifically defined. These views were expressed and taken into account during the drafting process and in general the usage of general terms has been reduced.

The terms 'reasonable' and 'appropriate' are both used thirteen times in standards. It is acknowledged in law that the word 'reasonable' has the prima facie meaning of 'reasonable' in regards of those existing circumstances of which the defendant, called upon to act reasonably, knows or ought to know.

In the introduction of the draft standards and guidelines for cattle a 'reasonable action(s)' is characterised as 'those actions regarded as reasonable to be done by an experienced person in the circumstances to address a problem, as determined by accepted practice and by other similarly experienced people. Use of the term has been agreed by the reference group to reflect the complexity of circumstances covered by the standards. It is acknowledged that the clause is open to interpretation and creates some uncertainty.

Usage in relation to 'at the first reasonable opportunity' has been criticised for implying a lack of timeliness or urgency, with alternatives to the phrase suggested such as 'promptly' or 'immediately'. These options have been considered by the reference group and rejected in favour of the more flexible phrase to allow cattle owners to optimally prioritise their responsibilities.

The use of the phrase; "to minimise risk to the welfare of cattle" in the objectives statements of the draft standards and guidelines for cattle points towards a common understanding of what is 'reasonable' in cattle husbandry in those areas where a complex interaction of factors make it difficult to create an acceptable prescriptive rule for the country. The expectation of what is 'reasonable' may be different between the cattle industries and the community. This reflects the widening knowledge gap between urban populations and livestock production systems. This conundrum may require prosecution test cases, education and perhaps over time community expectations may change.

Governments support the notion and value of general standards and there has been a conscious effort to develop the best option for clear, essential and verifiable standards where possible. Of the 52 standards proposed in the draft standards and guidelines for cattle, approximately 20 standards are general or have non-prescriptive elements.

An economy of words is pursued in the standards with minimal descriptive terms. The preferred use of terms has been built on the basis of past legal workshops, standards development and implementations. Notably, the land transport standards⁴. The lack of prescription and resulting inefficiency is acknowledged but this is in due recognition of the vast range of mitigating factors that may impact on welfare management in certain situations, for example during a natural disaster.

Use of defence clauses is not considered to be an advantage for the regulatory system and has not been used in the document. Revisions to specific standards are examined on a case by case basis later in this report.

Definitions

As stated above, the standards and guidelines document is a dual purpose document. The intended wide readership requires that a plain English approach be used and common use definitions are preferred. The definitions proposed have been carefully reviewed as they are an integral part of the draft standards and guidelines for cattle and are important to achieve consistent implementation of the standards.

Comprehensive debate has occurred on the key issue of competency and its definition. Many submissions referred to the terms “knowledge, experience and skills”, which are used throughout the draft standards and guidelines for cattle to describe competency requirements in relation to both general animal husbandry and more specific invasive procedures. The tendered view is that for such standards to be effective and verifiable, a system of assessment (and/or a record of training or accreditation) must be available to prove or disprove compliance. Where training and certification is required for a husbandry practice, this is specified.

Revisions to specific standards are examined on a case by case basis later in this report.

Consistency in legislation, monitoring and enforcement

The improvement of the regulatory system is only part of the justification for developing welfare standards. The achievement of harmonisation between jurisdictions regulatory systems is a major benefit of the standards development process. It is now accepted by a majority of parties that while full consistency is the ultimate goal, and ongoing reviews will continue to move that way, jurisdictional sovereign rights will remain a basis for minor variations prescribing different standards, judged to be appropriate for local conditions. These differences will occur despite the limitations of the science-base and enforceability of some standards.

Jurisdictions have stated previously for the RIS that no new resources will be made available for compliance and enforcement activities. Implementation is important but it is not an issue for the development of the standards. The RIS is a major test of the efficiency of new regulations and the value to the system. It is understood by

⁴ <http://www.animalwelfarestandards.net.au/land-transport/>

government regulators and industry leaders that both groups have a commitment to the implementation of welfare standards.

Public submissions expressing uncertainty and lack of confidence about the capacity and commitment of governments to promote, monitor and enforce regulated standards did not include any reference to the role of industry organisations in these activities or the development of industry quality assurance programs, which have been promoted by some industry groups as the preferred “self-regulatory” compliance strategy.

Consistency of enforcement programs is an important but separate issue from settling the standards and guidelines themselves, and from the role of industry groups in promotion and monitoring of compliance.

Independence and credibility of the standards development process

AHA works to protect and improve animal health and welfare within Australia. AHA is a not-for-profit public company established by the Australian, state and territory governments and major national livestock industry organisations. AHA’s role is to facilitate improvements in Australia’s animal health policy and practice in partnership with the livestock industries, governments and other stakeholders.

Under the AAWS, AHA manages the development of Australian Animal Welfare Standards and Guidelines for Cattle under an agreed development business plan established in 2005 and reconfirmed by government in 2009.

The vision is to establish national livestock welfare standards that reflect contemporary scientific knowledge, competent animal husbandry and mainstream community expectations, and that these standards are maintained and enforced in a consistent, cost-effective manner.

The fundamental components and workings of the development process are described in the introduction of the draft standards and guidelines for cattle and in the agreed development business plan, available at www.animalwelfarestandards.net.au.

An independent Chair oversees the two committees involved in development. The writing and reference groups have an agreed terms of reference, new membership, communication and record keeping policies for the project. The preparation of the standards represents a significant investment of time and effort by all parties, especially members of the writing and reference group members.

The cattle writing group is responsible for drafting the standards and guidelines for cattle. It is comprised of representatives from state and territory governments through Animal to Animal Welfare Committee (AWC), Cattle Council of Australia Inc. (CCA), Australian Lot Feeders` Association Inc. (ALFA), Australian Dairy Federation (ADF), CSIRO and the Department of Agriculture. The group is led by an independent Chair and supported by AHA. The RSPCA national body is specifically consulted at certain times for more complete animal welfare ethical considerations.

The cattle reference group is comprised of representatives from all aspects of cattle care and management. Cattle reference group meetings are held to review the standards and guidelines draft and to provide further guidance, a public consultation period is part of the process. The group is led by an independent Chair and supported by AHA.

The role of AHA is to:

1. Manage the overall process for the development of standards and guidelines according to the revised Standards and Guidelines Development Plan and under the direction of the writing group funding members and the reference group for each project.
2. Provide support to the Chair and provide leadership to facilitate solutions for animal welfare issues.
3. Recruit and manage outside consultants for key tasks, specifically; literature review, regulation impact statement, public consultation and editing.
4. Provide project support.
5. Ensure that final reports satisfy stakeholder requirements.

The overall outcome is to maintain a high level of consensus in decision making and transparency in recording any revised position. The project groups will disband with the passage of the documents to governments for consideration for endorsement in 2014.

The initial decision in 2008 to develop the cattle welfare standards is a shared decision between all governments and the cattle industry peak bodies; Cattle Council of Australia Inc., Australian Lot Feeders Association and the Australian Dairy Federation (ADF). It is acknowledged that the slow pace of development has in some cases contributed to mistrust over lack of apparent communication, the restricted resources for communication has meant that some participants may not have been adequately informed, and that the demands of some stakeholders cannot not be met.

Communication has relied on key industry, community, service provider, and government stakeholders, promoting, and passing information on, the process to their networks of contacts. A project meeting history is available at

<http://www.animalwelfarestandards.net.au/cattle/>

At the AHA-government livestock welfare relationships workshop on 8 and 9 March 2011, commitment was given to reviewing the Australian Animal Welfare Standards and Guidelines Development Business Plan at the completion of the cattle and sheep welfare projects. The concerns of welfare organisations, particularly in relation to the consultation process and resources were acknowledged. Subsequently, the Department of Agriculture Fisheries and Forestry (DAFF, now Department of Agriculture) commissioned a review of the standards and guidelines development process by the firm, Price Waterhouse Coopers. The report in July 2013 (available on the departments website) recommended fine tuning of various elements of the process

which is acknowledged to be relevant for future standards development projects and less relevant for this project which is now in the final stages.

The conclusion of the revision of the cattle welfare standards will be conducted according to the business plan available at <http://www.animalwelfarestandards.net.au/cattle/>

Finalisation with a recommendation to Ministers is planned for May 2014.

Decision making

Ultimately the revised standards and guidelines and the revised RIS are recommended to Ministers via the AWC, for consideration for endorsement.

The AWC is comprised of senior government representatives within departments of Agriculture who have animal welfare responsibilities. The AWC reports to the heads of Department (formally Primary Industries Standing Committee), which in turn reports to Ministers with responsibility for Primary Industry matters.

The Standing Council on Primary Industries (SCoPI) has considered priority issues of national significance affecting Australia's primary production sectors which require a sustained and collaborative effort across jurisdictions and address key areas of shared Commonwealth, state and territory responsibility and funding for Australia's primary production sectors.

SCoPI has developed and implemented policies and strategies for achieving agreed national approaches to biosecurity, productivity and sustainability of primary industries (including fisheries and forestry industries) and food security. It encouraged greater collaboration and promotes continuous improvement in the investment of research and development resources nationally.

Post consultation process

Following compilation of submissions⁵, AHA prepared documents for consideration firstly by the writing group and then the reference group consistent with the development business plan.

Whilst the focus is primarily on the standards, all matters are considered. Further details on participants and process are available at the below website:

<http://www.animalwelfarestandards.net.au/>

The categorisation and handling of issues identified in the public consultation was:

1. Irrelevant, not understood or factually incorrect material – no further action, explanation may be recorded. Where there has been a simple error of fact or interpretation of the proposed documents – this is not mentioned or corrected in this report. Communications with the stakeholder may have occurred to clarify issues of concern.

2. Minor correction or clarification – changes made and compiled for reference group consideration, including all guideline changes proposed.
3. Significant specific issue but no new solutions proposed in the context of previous reference group discussions – no further action but an explanation provided in the body of the consultation response report which may be further discussed.
4. Significant specific issue described, to be further considered by the reference group or subject to further collaborative working group process.

There were many suggestions for guidelines to become standards and vice versa. If the suggestion were accepted, the resultant action was to either redraft or delete the guideline or standard. Appropriate recommendations have been made for subsequent actions. Changes to standards and definitions with legal and/or cost implications will be examined under the RIS process.

As previously mentioned the four main decision-making principles used for standards are that they are:

- Desirable for livestock welfare
- Feasible for industry and government to implement
- Important for the livestock-welfare regulatory framework and,
- Will achieve the intended outcome for livestock welfare.

To expand on these major points in relation to any revision:

- Desirable for livestock welfare - the proposal leads to a worthwhile improvement in the welfare of cattle including that it is based on scientific research that has not yet been recognised and evaluated by the reference group. The specific proposal is proportionate to the magnitude of any proven welfare issue. Work health and safety considerations take precedence over cattle welfare, particularly in an emergency situation. There is a legal basis for this and also in a practical sense an injured person is not able to further care for the cattle.
- Feasible for industry and government to implement. The proposal is able to be implemented by industry and government with reasonable adjustment and cost. The RIS is a useful test of cost considerations.
- Important for the livestock-welfare regulatory framework. Preference is given to standards and guidelines that are prescriptive and are able to be measured or audited. Alignment with existing animal welfare concepts expressed in existing laws and the standards and guidelines proposal. The specific proposal has not been previously rejected by the reference group in the context of the current standards and guidelines framework and fills a gap in the current standard and guidelines proposal. This aspect also includes the number and variety of

responses that indicate shared concerns and the depth of reasoning behind these concerns and the proposed solutions.

- Will achieve the intended outcome for livestock welfare. The proposal does not contradict or confuse other laws or proposed standards and guidelines or does not result in an action that has negative consequences for cattle.

The list does not infer emphasis in the logic that may be applied and in most cases there were multiple reasons for a decision. Only the main reason for a recommendation in this draft report is cited. In many cases several of the above points were relevant.

Submissions from animal welfare/rights organisations and from many individuals supporting them, disputed the introductory statement that the standards “reflect available scientific knowledge, current practice and community expectations”. Claims that the standards are out of touch with community values and expectations and do not lead to industry change in current practice, are difficult to substantiate particularly with the evidence provided. These views were also expressed and taken into account during the drafting process. Further revisions to specific standards are examined on a case by case basis later in this document.

Future communication and extension

There is a huge need for tailored consultation and communications with relevant industry sectors once the standards are endorsed by state and territory governments. This consultation should include a detailed discussion on the implementation of the standards into state or territory legislation. There will need to be consideration of how successful sustained, long term communication might be achieved by stakeholders. In part this will be assisted by the recently developed communication strategy for the cattle welfare standards.

The Communication Strategy was supported by the AAWS and its development was managed by Meat and Livestock Australia on behalf of the AAWS Livestock and Production Animals Working Group. One of the two documents produced is written specifically for the final launch of the cattle and sheep standards and guidelines and the other is a more generic 'template' for other standards and guidelines as they are developed and released in the future.

SPECIFIC ISSUES BY CHAPTER

Chapter 1 Responsibilities

S1.1 A person must take reasonable actions to ensure the welfare of cattle under their care.

The following changes to standards were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
S1.1	Various	<p>Various</p> <p>Open to interpretation (RSPCA, ALQ, Voiceless, AA, other welfare/rights groups) – do not accept “reasonable actions”. “Reasonable access” implies access should not be assured or guaranteed but merely “reasonable”. Re-word S2.1 to make it an offence to fail to provide adequate and appropriate feed and water, subject to the defence of no failure to take reasonable care (LSSA) – will remove uncertainty.</p> <p>RSPCA, ALQ both want some or all elements of G1.1 incorporated into S1.1.</p> <p>WSPA – amend to “a person must ensure good welfare of all cattle under their care”.</p> <p>A person who is responsible for cattle has a duty of care to ensure the welfare of those cattle.” Vic DEPI</p> <p>“Reasonable actions” implies actions should not be assured or guaranteed but merely “reasonable”. Re-word S1.1 to make it an offence to fail to take actions, subject to the defence of no failure to take reasonable care (LSSA) – will remove uncertainty.</p>	<p>No further action was agreed. See text below and in general issues for discussion of ‘reasonable actions’.</p> <p>Aspects requiring further detail in relation to the four tests approach are covered in other standards.</p> <p>Duty of care agreed but not thought necessary to incorporate in the standard.</p>

No change recommended by the writing group or the reference group. It is acknowledged that this is a general standard that is difficult to enforce but has an important message for the acceptable management of cattle. The value of the general standards has been agreed by the majority of the reference group in previous meetings. The use of general standards has been minimised as it is recognised that it creates a need for further explanation or interpretation.

The terms ‘reasonable’ and ‘appropriate’ are both used thirteen times in standards. It is acknowledged in law that the word ‘reasonable’ has the prima facie meaning of ‘reasonable’ in regards of those existing circumstances of which the defendant, called upon to act reasonably, knows or ought to know.

In the introduction a 'reasonable action(s)' is characterised as 'those actions regarded as reasonable to be done by an experienced person in the circumstances to address a problem', as determined by accepted practice and by other similarly experienced people. It is not intended that all reasonable actions are described in this document'. Use of the term has been agreed by the reference group to reflect the complexity of circumstances covered by the standards. It is acknowledged that the clause is open to interpretation and creates some uncertainty.

In considering the need for further standards, the writing and reference groups assessed four main decision-making principles for standards.

The following changes to guidelines were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
Objective	Sentient	Replace “able” with “competent” A person knows their responsibilities for cattle welfare and is able to perform the required tasks to minimise the risk to the welfare of cattle.	No further action, as considered by the WG and RG previously.
G1.1	Hides (Vet) Vic DEPI	Should include new dot point knowledge of local patterns of disease, disease prevention and use of low stress stock handling techniques. Add of competency AGREED CHANGE G1.1 Elements of responsibility for cattle management should include: <ul style="list-style-type: none"> • understanding the standards and guidelines for cattle welfare • obtaining knowledge of relevant animal welfare laws • understanding cattle behaviour, <u>and use of low stress stock handling techniques.</u> • planning and undertaking actions for the enterprise to meet the welfare standards and address contingencies that may arise • assessing the of quantity, quality and continuity of feed and water supply • handling to minimise stress, and using handling aids, facilities and other equipment appropriately • undertaking hygienic practices for husbandry procedures in a manner that minimises the risks to cattle welfare • understanding and following chemical and drug treatment instructions for cattle 	WG agreed – additional dot point. Knowledge of local patterns of disease, disease prevention and use of low stress stock handling techniques. SRG supported but changed the placement of the new dot point. No Further Action regarding “competency” as considered by the WG and RG previously.

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		<ul style="list-style-type: none"> identifying distressed, weak, injured or diseased cattle, and taking appropriate action maintaining appropriate records knowledge of local patterns of disease, disease prevention and use of low stress stock handling techniques humanely killing cattle by appropriate methods, or seeking the assistance of someone who is capable and equipped to kill them humanely. 	
G1.2	Vic DEPI	<p>Suggest change to “understood by all parties involved”.</p> <p>Previous - G1.2 Agistment responsibilities should be documented, communicated and clearly understood by both parties.</p> <p>AGREED CHANGE</p> <p>G1.2 Agistment responsibilities should be documented, communicated and clearly understood by <u>all</u> parties <u>involved</u>.</p>	<p>WG agreed to the suggested change.</p> <p>SRG supported.</p>

In relation to ‘competency’, it has been previously agreed by the reference group that this quality is best described by the equivalent words; ‘knowledge, skills and experience’, to avoid any implication that mandatory training and certification is required.

Minor changes to wording of two guidelines for clarification were agreed by the writing and reference groups.

Chapter 2 Feed and Water

S2.1 A person in charge must ensure cattle have reasonable access to adequate and appropriate feed and water.

The following changes to standards were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
S2.1	Various	<p>“Reasonable access” implies access should not be assured or guaranteed but merely “reasonable”. Re-word S2.1 to make it an offence to fail to provide adequate and appropriate feed and water, subject to the defence of no failure to take reasonable care (LSSA) – will remove uncertainty.</p> <p>Access to water at all times (i.e. daily) - RSPCA, WSPA, Saklani form letter (most content identical to RSPCA), AA, ALC and other lawyer groups, Vic DEPI, general public.</p> <p>Daily access to water should be a standard except for assembling for yarding &/or transport (Vic DEPI).</p> <p>Subjective terms make S2.1 meaningless and unenforceable (AA).</p> <p>Remove “reasonable” (Sentient)</p> <p>Should include a maximum time off water (TOW) for on-farm activity which should be consistent with the times allowed during transport (Vic DEPI).</p> <p>PETA suggests replace “reasonable” with “sufficient to meet all welfare needs, as judged by clear, verifiable factors”.</p> <p>Spit standard into two – feed / water.</p>	<p>No further action was agreed. See text in chapter one and in general issues for discussion of ‘reasonable actions’.</p> <p>LSSA models its suggestions on SA Animal Welfare Act, avoiding ambiguity of terms including “reasonable”. It is alleged that “reasonable care” is an easier concept in the courts. This view was not upheld.</p> <p>TOW – standard agreed not consistent with the S&G approach to date. Transport is a more stressful situation that requires prescriptive limits.</p>
New	Vic DEPI and RSPCA	<p>Suggested New Standards</p> <p>A new standard should specify a minimum “mob average” body condition score for each class of cattle (Vic DEPI).</p> <p>RSPCA seeks a new standard mandating access to roughage at all times - does not accept the meaning of S2.1 “adequate” and “appropriate”.</p>	<p>MLA have recently released Body Condition Score (BCS) guide. A BCS standard was considered to be too prescriptive for a national approach.</p> <p>No Further Action - Roughage question considered covered by ‘adequate and</p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
			appropriate”.
Define		Define access to feed.	No Further Action. Use plain English meaning.

See chapter one for discussion on general standards and the term ‘reasonable’.

The following changes to guidelines were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
G2.2	Vic DEPI	Suggest add adequate supply Regular assessment should be made of the needs of the cattle in relation to the quantity and quality of feed and water, to ensure an adequate supply. G2.2 Regular assessment should be made of the needs of the cattle in relation to the quantity and quality of feed and water.	Doesn’t add much. No further action was agreed
G2.4	Vic DEPI	Suggest add daily requirements Feed supplements should be carefully assessed for suitability and safety, to meet the dietary requirements of the cattle. G2.4 Feed supplements should be carefully assessed for suitability and safety.	Doesn’t add much. No further action was agreed
G2.5	Evans/Sutton Vic DEPI	Upgrade to a Standard Major changes in diet should be introduced over an appropriate length of time and closely monitored for any new supplement, particularly those involving cereal grain or grain based pellets. G2.5 Major changes in diet should be introduced over an appropriate length of time and be closely monitored.	No further action was agreed
G2.6	Evans/Sutton	Upgrade to a Standard G2.6 Shy feeders should be identified and managed appropriately.	No further action was agreed
G2.7	Port Adelaide Monitors, PETA	Delete “or managed” and upgrade to a Standard. G2.7 Cattle access to contaminated and spoilt feed, toxic plants and harmful substances should be avoided or managed.	No further action was agreed

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
G2.8	AW/AR Groups, Sentient	Upgrade to a Standard. G2.8 Self feeders should be checked, cleaned and maintained regularly.	No further action was agreed
G2.10	LLSA	Delete ‘reasonable’ G2.10 Cattle should have reasonable access to water at least daily.	No further action was agreed – guideline is a recommendation for better welfare than the standard.
G2.11	Hides (Vet)	Not appropriate for lactating cows which require a continuous supply of water, especially given the size of herds. G2.11 Lactating cows, and all cattle in hot weather, should have access to water at least twice daily.	No further action was agreed
G2.12	AW/AR Groups, Sentient, Evans/Sutton	Upgrade to a Standard G2.12 Calves removed from cows should have access to water at all times.	No further action was agreed
G2.13	PETA, AW/AR Groups, Sentient	Upgrade to a Standard G2.13 Where the water quality is known to be variable, it should be monitored regularly for harmful substances and managed to protect cattle welfare.	No further action was agreed
G2.14	PETA, AW/AR Groups, Sentient	Upgrade to a Standard G2.14 Water infrastructure should be inspected and maintained to allow effective provision of water in a reasonable time.	No further action was agreed
G2.17	LLSA ALQ	Delete ‘as soon as possible’ ALQ seeks all feed guidelines to be converted into standards and suggests G2.17 access to Colostrum. G2.17 Calves should receive adequate colostrum within 12 hours of birth, with the first feed occurring as soon as possible.	No further action was agreed – adequate for the purposes of a guideline.

The cattle writing group and the cattle reference group agreed to no further changes in chapter two.

Chapter 3 Risk Management

S3.1	A person in charge must take reasonable actions to ensure the welfare of cattle from threats, including *extremes of weather*, *drought*, fires, floods, disease, injury and predation.
S3.2	A person in charge must ensure the *inspection* of cattle at intervals, and at a level appropriate to the production system and the risk to the welfare of cattle.
S3.3	A person in charge must ensure appropriate treatment for sick, injured or diseased cattle at the first reasonable opportunity.

The following changes to standards were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
S3.1	Various	Not strong enough – access to shelter must be available at all times (RSPCA, WSPA, general public, Voiceless etc.) An aspiration , not a standard (AA)	No further action was agreed G3.3 exists to provide guidance. Shelter presents challenges in most production systems.
S3.2	Various	Reverse wording to put risk to the welfare of cattle before the production system (Evans/Sutton) Inadequate – require at least weekly inspection (AA) Must be daily (Edgar's Mission).	No further action was agreed Not really a meaningful change – risk is dependent on production system.
S3.3	Various	Should include the wording of G3.6 to mandate veterinary advice as follows: "A person in charge must seek appropriate veterinary advice for sick, injured or diseased cattle at the <u>earliest opportunity and ensure appropriate treatment for all affected animals.</u> " (PETA) LSSA – concerns with " at the first reasonable opportunity " – undefined and creates strong defence. WSPA also takes issue with "first reasonable opportunity" Replace "reasonable" with "available" and link with weekly inspections (i.e. amended S3.2 – AA) S3.2 and S3.3 - re- word to account for emergencies where routine actions are not possible (Pyramid Station).	No further action was agreed G3.6 is a higher recommendation consistent with S&G approach No further action was agreed No further action was agreed - 'reasonable' takes account of this aspect.

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
			No further action was agreed

Usage in relation to ‘at the first reasonable opportunity’ has been criticised for implying a lack of timeliness or urgency, with alternatives to the phrase suggested such as ‘promptly’ or ‘immediately’. These options have been considered by the reference group and rejected in favour of the more flexible phrase to allow cattle owners to optimally prioritise their responsibilities.

The use of the phrase; “to minimise risk to the welfare of cattle” in the objectives statements points towards a common understanding of what is ‘reasonable’ in cattle husbandry in those areas where a complex interaction of factors make it difficult to create an acceptable prescriptive rule for the country. It is this difficulty in developing a single national standard for say, inspection of cattle, that is relevant and fairly applicable for all cattle management circumstances, that precludes the further development of a national standard.

The following changes to guidelines were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
New Guidelines	Vic DEPI	Carcases should be disposed of where possible Should consider inclusion of a guideline for carcase disposal. Although carcase disposal is generally a management issue, it may lead to animal welfare issues if carcasses are left in-situ.	No further action was agreed - Guideline on carcasses disposal - not agreed due to lack of relevance and mainly a small herd issue.
New Guidelines	Vets	Consider new “Disease and Injury” guidelines to require knowledge of local patterns of disease and standard prevention procedures for commonly occurring diseases.	No further action was agreed – too prescriptive. An additional point added to G1.1.
G3.11, G7.5, G7.6, G7.9	Vic DEPI	G3.11, G7.5, G7.6 and G7.9 are in “conflict” with S3.3. and cruelty legislation in Victoria (Vic DEPI) G3.11 Downer cattle should be assessed and treated without delay. See chapter seven. G7.5 Cows that receive severe injuries during	S3.3 consistent with POCTA No further action was agreed. The guidelines are better welfare – The statement of timing issue is critical – ‘without delay’ requires a greater urgency

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		<p>calving or that are affected by a severe adverse outcome (prolapsed uterus, unable to remove calf) should receive urgent treatment, or be humanely killed without delay.</p> <p>G7.6 Weak or orphaned calves with very little chance of survival should be humanely killed.</p> <p>G7.9 Cows subject to an induction program should be inspected twice daily. Any cow requiring calving assistance or treatment should receive this intervention at the first opportunity.</p>	<p>than 'at the first reasonable opportunity'.</p> <p>Vic POCTA:</p> <p>9 (1)(h) abandons an animal of a species usually kept in a state of confinement or for a domestic purpose; or</p> <p>(i) is the owner or the person in charge of a sick or injured animal and <u>unreasonably</u> fails to provide veterinary or other <u>appropriate attention or treatment</u> for the animal;</p>
G3.1	Evans/Sutton Vic DEPI	<p>Upgrade to a Standard.</p> <p>Add - Contingency plans to minimise risks to cattle welfare should include preparation for.</p> <p>G3.1 Plans to minimise risks to cattle welfare should include:</p> <ul style="list-style-type: none"> • emergency contact details • breakdown or mechanical failure affecting feed, water, ventilation or milking • adverse weather — specifically, conditions that predispose cattle to heat or cold stress • flood and fire • insufficient supply of feed or water • disease outbreak or injury • emergency killing and disposal • other issues specific to the enterprise or cattle being managed. 	<p>No further action was agreed</p> <p>Planning is consistently treated as a guideline issue with recommendations made.</p>
G3.2	Sentient, public submissions	<p>Upgrade to a Standard.</p> <p>G3.2 Drought strategies should be prepared in advance and then progressively implemented before paddock feed runs out, and may include:</p> <ul style="list-style-type: none"> • relocation • supplementary feeding • use of stock containment areas 	<p>No further action was agreed</p> <p>As above.</p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		<ul style="list-style-type: none"> • sale or agistment • segregation according to risk • early weaning • humane killing. 	
G3.3	AW/AR groups, many public submission, (Evans/Sutton – with omission of “if practical”)	Upgrade to a Standard. G3.3 If practical, cattle should be provided with adequate shelter to minimise risks to welfare during inclement weather.	No further action was agreed, contingency plan can be used to minimise the risk.
G3.4	PETA	Upgrade to a Standard. G3.4 Cattle handling should be minimised during extremely hot weather.	No further action was agreed
G3.4	Sentient LSSA	Replace “extremely hot weather” with “during high temperatures and/or high humidity”. G3.4 Cattle handling should be minimised during extremely hot weather. Define “ extremely hot weather ” according to No further action was agreed S.	No further action was agreed Cattle adaptation around the nation will vary. Often the variability of the weather has more impact than the actual parameters regularly experienced.
G3.8	LSSA	Better definition of record keeping requirements.	No further action was agreed - use plain English meaning.
G3.5 and G3.11	ALQ, PETA, WSPA Evans/Sutton, AA	Upgrade to a Standard. G3.5 Unexplained disease and deaths should be investigated to formulate appropriate remedial and preventive actions. G3.11 Downer cattle should be assessed and treated without delay.	No further action was agreed G3.11 – description as ‘downer’ implies a level of assessment G>S3.3 – without delay
G3.2 and G3.6	Sentient, private submissions Evans/Sutton	Upgrade to a Standard. G3.2 Drought strategies should be prepared in advance G3.6 Appropriate veterinary advice on cattle disease diagnosis, prevention or treatment should be sought as required.	No further action was agreed

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
G3.7	Evans/Sutton	Upgrade to a Standard. G3.7 Cattle should be vaccinated to protect against likely infectious diseases if there is a significant risk to the welfare of cattle.	No further action was agreed
G3.8	Sentient, Vic DEPI	Upgrade to a Standard and specify that treatment records should be retained for a specified period and made available for audit/inspection - to be consistent with state Ag & Vet Chemical control of use legislation. G3.8 Treatments and vaccines should be administered in accordance with directions. Records of treatments should be kept.	No further action was agreed Not concerned about other legislative issues.
G3.8	Vic DEPI	Insert “the manufacturer’s” before “directions”. G3.8 Treatments and vaccines should be administered in accordance with directions. Records of treatments should be kept.	No further action was agreed
G3.9, G3.10	Sentient	Upgrade to a Standard. G3.9 Consideration should be given to selecting cattle that are suitable for and adapted to the production environment, and that are resistant to parasites and specific diseases relevant to the environment. G3.10 Internal and external parasites should be monitored and controlled.	No further action was agreed

The cattle writing group and the cattle reference group agreed to no further changes in chapter three.

Chapter 4 Facilities and Equipment

S4.1 A person in charge must take reasonable actions in the *construction*, maintenance and operation of *facilities* and equipment to ensure the welfare of cattle.

The following changes to standards were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
S4.1	Various	Open to interpretation – RSPCA , ALQ, WSPA et al - Don't accept "reasonable actions" WSPA seeks to replace "take reasonable actions" with "ensure" S4.1 is unenforceable as it is worded (Vic DEPI). RSPCA, Sentient , Evans/Sutton want most or all the guidelines incorporated into S4.1 Add "appropriate to the production system/seasonal factors." (AgForce)	Definition of construction and facilities - use plain English meaning. No further action was agreed No further action was agreed. Covered by 'reasonable'.
New	Evans/Sutton	New Standard proposed for housed cattle "Cattle must not be maintained in single pens for commercial production systems".	No further action was agreed – S8.2 in place for calves. Not a practice of concern in Australia.

No further changes were agreed by the writing group to the standards.

The following changes to guidelines were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
G4.4	Vic DEPI	G4.4 should be a standard. Otherwise it is in conflict with S4.1 and also SA3.1 (iv) of the Land Transport Stds. G4.4 Facilities should be free of protrusions and obstacles that <u>may</u> cause injury. LTS - SA3.1 A person in charge must ensure that the vehicles and livestock handling facilities are constructed, maintained and operated in a way that minimises risk to the welfare of livestock. Vehicles and facilities must:	G4.4. No further action was agreed. As a higher recommendation than S4.1 and the change from 'may' will mean a lower recommendation. Problem with LTS SA 3.1 iv – 'could' should be 'will' is a contextual issue that should be addressed in a future revision of the LTS. It refers for the potential of an object to cause injury to be mitigated, as opposed

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		<p>i) be appropriate to contain the species; and</p> <p>ii) have effective airflow; and</p> <p>iii) have flooring that minimises the likelihood of injury or of livestock slipping or falling; and</p> <p>iv) be free from internal protrusions and other objects that could cause injury; and</p> <p>v) have sufficient vertical clearance for livestock to minimise the risk of injury.</p>	to dealing with a recognised hazard. It was stated that the recognition of a higher degree of risk in transport situations is appropriate.
G4.2, G4.4 G4.6, G4.7, G4.8, G4.9, G4.10, G4.11	<p>Private submissions</p> <p>PETA</p> <p>Private Submissions</p>	<p>Upgrade to a Standard.</p> <p>G4.2 Passage ways, races and entrances should be designed to take advantage of cattle behaviour and to reduce stress during movement through facilities. Visual barriers should be used as appropriate. Changes in levels, poor lighting, narrow or uneven passages, and awkward turns should be avoided.</p> <p>G4.4 Facilities should be free of protrusions and obstacles that may cause injury.</p> <p>G4.6 Faeces and urine accumulations should be removed regularly.</p> <p>G4.7 Housed systems should have hospital pens with a comfortable lying surface for sick or injured cattle, and the means to move downer cows to the hospital pen.</p> <p>G4.8 A normal diurnal pattern of lighting should be provided for indoor cattle.</p> <p>G4.9 Cattle should have the opportunity for appropriate exercise each day.</p> <p>G4.10 Air should be of acceptable quality with respect to dust, chemicals and smells. Continuous periods of detectable smoke should be avoided.</p> <p>G4.11 Concrete flooring in rest areas should be covered by an appropriate depth of bedding material.</p>	No further action was agreed
G4.12	ALQ, PETA, de Fraga, AA, Vic DEPI	<p>(Fire equipment) should be mandatory in indoor housing systems – including a written emergency plan.</p> <p>G4.12 Fire alarms and adequate firefighting equipment should be fitted and maintained in all indoor housing systems.</p>	No further action was agreed

The cattle writing group and the cattle reference group agreed to no further changes in chapter four.

Chapter 5 Handling and Management

Handling and management

S5.1 A person must handle cattle in a reasonable manner.

S5.1b A person handling cattle must ~~handle cattle in a reasonable manner and must~~ not:

- 1) *lift* cattle off the ground by only the head, ears, horns, neck or tail unless in an *emergency*; or
- 2) drop cattle except to land and stand on its feet; or
- 3) strike cattle in an unreasonable manner, punch or kick; or
- 4) drag cattle that are not standing, except in an *emergency*, for the minimum distance to allow safe handling, *lifting*, treatment or humane killing; or
- 5) deliberately dislocate or break the tail of cattle; or
- 6) use metal pellets to wound cattle as an aid for mustering.

S5.2 A person must not drive cattle to the point of collapse.

S5.3 A person must consider the welfare of cattle when using an electric prod, and must not use it:

- 1) on genital, anal, or udder ~~or facial~~ areas of cattle; or

1b) on facial areas, unless cattle welfare is at risk; or

- 2) on calves less than three months old, unless their welfare is at risk; or
- 3) on cattle that are unable to move away; or
- 4) in an unreasonable manner on cattle.

S5.4 A person ~~if using in charge of a dog, must have it~~ the dog in charge must have a dog *under effective control* at all times during the handling of cattle.

S5.5 A person in charge must ensure a dog is muzzled when moving calves less than 30 days old that are without *cows*.

S5.6 ~~A person in charge must ensure cattle are accustomed to tethering before they are tethered for long periods.~~

A person in charge must ensure tethered cattle are able to exercise daily.

Electro-immobilisation

S5.7 A person must only use *electro-immobilisation* on cattle if:

- 1) the device is approved for use in the jurisdiction; and
- 2) the cattle are more than six months old; and
- 3) the operator is trained or it is done under *direct supervision* of a veterinarian or a trained person; and
- 4) alternative restraining methods are not adequate to hold cattle sufficiently for the procedure being performed.

S5.8 A person must not use *electro-immobilisation* on cattle as an alternative to *pain relief*.

Identification

S5.9 A person must use the most appropriate and least painful method to identify cattle that is applicable to the jurisdiction and the production system.

S5.10 A person must not place a permanent brand on the head of cattle.

The following changes to standards were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
S5.1	Various	<p>Replace ‘reasonable’ with ‘appropriate’ - More consistent with prescriptive elements.</p> <p>Add “lift or carry” by one leg” to S5.1 (1) (LSSA)</p> <p>Remove “except in an emergency” (WSPA)</p> <p>No dropping at all (RSPCA)</p> <p>No hitting at all (RSPCA, AA, ALQ, PETA)</p> <p>S5.1 (5) is unenforceable (Saklarni, PETA, Vic DEPI) Suggest remove “deliberately” (de Fraga, AA); Sentient suggests add “or recklessly”</p> <p>Reckless injury without intent to harm should be penalised (Vic DEPI)</p> <p>Add 5.1(7): “use direct contact with a motor vehicle to move cattle” (De Fraga, AA)</p> <p>S5.1 (3) is unclear (AVA).</p>	<p>No further action was agreed – current standard supported by CCA and ADF.</p> <p>‘Carry’ is covered by ‘lift’.</p> <p>These suggestions do not recognise practical aspects of cattle handling that are often in the best interests of the cattle.</p> <p>Discussed contact with a motor vehicle, agreed not include as feral bulls would need an exception.</p> <p>Use of ‘reasonable’ dealt with in chapter one.</p> <p>The SRG agreed to split</p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
			the standard S5.1 into two standards for clarity.
S5.2	Various	<p>Add “or attempt to drive an animal that is not fully ambulatory or considered fit and healthy to travel the distance required” (WSPA)</p> <p>Replace “collapse” with “exhaustion” (Vic DEPI)</p> <p>Replace “collapse” with “distress” (OIE Code - AA)</p> <p>Strengthen by addition of “visible distress, exhaustion or” before “collapse”</p> <p>Should be a Guideline not a Standard (Canterbury Stud, NSW Farmers)</p>	<p>No further action was agreed. Discussed S5.2 becoming a guideline NOT AGREED.</p> <p>Discussion on replacement of collapse - not agreed as collapse is very clear to see and determine.</p>
S5.3	Various	<p>Ban electric prodders (RSPCA, AA, Voiceless, ALQ, BAAA¹)</p> <p>Use only for welfare or in emergency (PETA)</p> <p>Add “must only use it as sparingly as possible and with restraint”</p> <p>5.3(1) is unreasonable – minimal use on facial area may be the only way to move cattle backwards in an emergency (Bloomfield, others)</p> <p>S5.3 (2) is inconsistent with SA5.8 of the Land Transport Standards which prohibit electric prodders on livestock under three months old. The words "unless their welfare is at risk" should be removed (Vic DEPI).</p> <p>LTS SA5.8 A person who handles livestock in the transport process must not use an electric prodder unless permitted in that species and must not use it:</p> <ul style="list-style-type: none"> i) on genital, anal or facial areas; or ii) on livestock under three months old; or iii) on livestock that are unable to move away; or iv) excessively on an animal. <p>AGREED Change</p> <p>S5.3 A person must consider the welfare of cattle when using an electric prodder, and must</p>	<p>No further action was agreed</p> <p>No further action was agreed</p> <p>No further action was agreed Delete part (iv) consistent with SA AWR and LSSA views on ‘reasonable’.</p> <p>No further action was agreed</p> <p>Unresolved - Remove “unless their welfare is at risk”?</p> <p>A person cannot use an electric prodder on calves in Victoria under POCTA Act. – A matter of interpretation? SWG could not identify this, the closest is the general POCTA clauses: (c) <i>does or omits to do an act with the result that unreasonable pain or suffering is caused, or is likely to be caused, to an</i></p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		<p>not use it:</p> <p>1) on genital, anal, or udder areas of cattle; or</p> <p>2) <u>on facial areas ,unless their cattle welfare is at risk;</u> or</p>	<p><i>animal; or (d) drives, conveys, carries or packs an animal in a manner or position or in circumstances which subjects or subject, or is likely to subject, it to unnecessary pain or suffering; or</i></p> <p>Use on the face AGREED</p> <p>Change to S5.3 - When you need release a pile up of animals in a race.</p> <p>The SRG supported the additional point on facial areas recommended by the WG with an agreed minor change in wording from “their” to “cattle”.</p> <p>RSPCA does not agree with 1b 1b) on facial areas, unless cattle their welfare is at risk; or</p>
S5.4 and S5.5	Various	<p>Prohibit dogs in yards (RSPCA)</p> <p>Dogs should not be used at all on calves <6mo or on cows with calves at foot (RSPCA, NSW Vets, SCTRLHC, AA, others)</p> <p>Modify S5.5 – “A person in charge must ensure that dogs are not used when handling unweaned calves” (Evans)</p> <p>NTDPIF – ban use of dogs on calves <30 days old</p> <p>Muzzle all dogs while working with cattle (AA)</p> <p>Remove S5.5 or move to Section 9 – muzzled dogs cannot drink (PGAWA, AgForce, Cattle Council)</p> <p>Re-word for consistency with Sheep S&G (NSW Farmers)</p>	<p>Dogs – WG agreed no change – agreed no need to describe type of muzzle.</p> <p>The reasonable use of dogs on all classes of cattle is substantially a different issue to that of sheep. It was believed that the existing standards S5.4 & 5.5 are adequate.</p> <p>The SRG agreed a minor change to standard S5.4 for better English use.</p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
S5.6	Various	<p>Ban permanent tethering or for “long periods” (RSPCA, WSPA, AA, SCTRLHC, NTDPPIF)</p> <p>This standard should additionally specify that tethered cattle must be inspected daily (TAS DPIWE).</p>	<p>No further action was agreed - Tethering – WG agreed no change</p> <p>SRG agreed split the standard into two for improved clarity and then convert the first part into a guideline</p>
Tethering definition	Vic	The securing of an animal to an anchor point to confine it to a desired area. It is not short term tying up or hobbling.	Agreed.
S5.7	Various	<p>Ban electro-immobilisation (RSPCA, WSPA, AA, Voiceless, ALQ, Vic DEPI, others)</p> <p>Banned under POCTA in Victoria</p> <p>OIE Code says EI “should not be used”</p> <p>5.7(2) is unenforceable (Cattle Council, NSW Farmers)</p> <p>5.7 (3) “training” should be defined – given G5.22 requires a high level of training, re-word to require a veterinarian or a person formally trained in the use of electro-immobilisers (LSSA)</p> <p>5.7(3) “trained” needs to recognise competency from past learning (Bloomfield) – no formal training available (Cattle Council)</p> <p>EI strongly supported by cattle industry organisations (Agforce, PGAWA, Cattle Council)</p> <p>Add (5) “pain relief is provided as appropriate for the procedure” (Sentient)</p>	<p>No further action was agreed - Notwithstanding banned in VIC, NSW Vet only, generally accepted appropriate to use.</p>
S5.9	Various	<p>Weak/inadequate/meaningless (welfare/rights groups)</p> <p>Very vague standard (not even a useful guideline) – of little to no value as it stands. Best left for future traceability standards to mandate identification (Vic DEPI).</p> <p>Ban hot iron branding (RSPCA, WSPA, AA, Voiceless, LSSA, BAAA, others)</p>	<p>Reason for the standard is for fire branding but also covers ear branding, tagging, branding. Agreed ear marking not relevant for a standard. Agreed reword standard.</p> <p>AGREED CHANGE by</p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		<p>Ban ear marking (RSPCA, Evans/Sutton)</p> <p>Hot iron branding - an essential management tool and compulsory in QLD under the Brands Act (AgForce)</p> <p>S5.9 A person must use appropriate methods and techniques to identify cattle that are applicable to the production system.</p>	<p>WG</p> <p>S5.9 A person must only use hot iron branding on cattle if:</p> <ol style="list-style-type: none"> 1) the method is approved for use in the jurisdiction; and 2) the operator is trained or it is done under *direct supervision* of a trained person; and 3) alternative identification methods are not adequate. <p>The SRG did not agree the WG suggestion. The SRG agreed the following new standard.</p> <p>S5.9 A person must use the most appropriate and least painful method to identify cattle that is applicable to the jurisdiction and the production system.</p>
New	de Fraga	<p>Analgesia should be required where fire-branding is used. Note the AVA policy on horse branding: "It is recognised that there are circumstances in which fire branding is the only practical option and in such cases appropriate analgesia should be used to minimise distress and/or pain." The situation should be no different for cattle (de Fraga).</p>	<p>No further action was agreed – The horse policy is not considered entirely relevant for cattle.</p>

Four significant revisions to the standards have been recommended by the writing and reference groups in this chapter in response to the submissions. A definition for tethering is proposed. This is not believed to add any cost to current cattle enterprises.

S5.1 has been split into two standards to better deliver the message on cattle handling practice.

S5.3 has been revised to allow the use of electric prodders on facial areas, if cattle welfare is at risk. This means that where it is necessary to 'back up' cattle in a race way if there is a pile up or like situation, then it is permissible to use the prodder on a facial area having due regard for avoiding the eyes. This provision is also relevant to the land transport standards and if accepted, should figure in a future revision of the Land Transport Standards.

S5.6 has seen the deletion of the first part of the standard and the embodiment into a new expanded guideline on tethering.

S5.9 hot iron branding was considered to be the major welfare issue in relation to identification of cattle and the writing group responded to submissions to improve the existing general standard. This was done in line with the approach for equivalent standards with a sole focus on hot iron branding. However the reference group did not support this approach and a new standard on identification was drafted.

In relation to the matters raised in the RIS variations, the following explanation is offered;

Variation	Action	Comment
C3: ban permanent tethering	Not supported as a standard	Supported for inclusion in RIS Option C
C4: ban the use of dogs on calves	Not supported as a standard	Supported for inclusion in RIS Option C
C7: ban electro-immobilisation.	Not supported as a standard	Supported for inclusion in RIS Option C

C3: ban permanent tethering – See sections A2.4 and A3.3 of the Consultation RIS.

RIS survey question 9 - Do you believe that the benefits achieved under variation C3, including welfare benefits of banning tethering and reduction in excess regulatory burden, are justified?

No. of responses	Agree	Disagree	Neutral
103	64%	23%	13%

In general it is believed that tethering is not a significant threat to the welfare of cattle if properly managed as required by the proposed standard S5.6. Tethering is a minority practice that does not warrant further regulatory action. However it can be an important issue for cattle due to confinement, social deprivation, provision of feed, water, shelter and exercise aspects. A new guideline has been provided.

C4: ban the use of dogs on calves – See sections A2.3 and A3.4 of the Consultation RIS.

RIS survey question 10 - Do you believe that the benefits achieved under variation C4, including welfare benefits of banning the use of dogs on calves and reduction in excess regulatory burden, are justified?

No. of responses	Agree	Disagree	Neutral
102	65%	25%	10%

In general it is believed that the use of dogs on calves without mothers (bobby calves) is not a significant threat to the welfare of calves if properly managed as required by the proposed standards S5.4 and S5.5. The use of dogs on calves without mothers is a minority practice mostly restricted to the dairy industry and is banned in some jurisdictions. It does not warrant further regulatory action. This issue is different from the controlled use of dogs on weaner age cattle. The importance of controlled use of dogs on weaner age cattle for their handling education is acknowledged.

C7: ban electro-immobilisation – See sections A2.5 and A3.7 of the Consultation RIS.

RIS survey question 13 - Do you believe that the benefits achieved under Variation C7, including welfare benefits of banning electro-immobilisation and reduction in excess regulatory burden, are justified?

No. of responses	Agree	Disagree	Neutral
101	65%	24%	11%

It was noted that electro-immobilisation is not permitted in some jurisdictions (Victoria), or is veterinarian only (NSW) but others believe that there was a net welfare benefit from the availability of this restraint method for cattle. In general it is believed that the use of electro-immobilisation is not a significant threat to the welfare of cattle if properly managed as required by the proposed standards S5.7 and S5.8.

Appropriate use of the method as a drug free restraint alternative for simple procedures not requiring pain relief is supported. Examples of such procedures include: horn tipping in mature cattle, oral examinations, ear tag application in bulls, removal of entanglements and examination of injuries to legs or penis. The significant human occupational safety benefits are also acknowledged.

The following changes to guidelines were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
G5.7	Vic DEPI	Upgrade to a Standard and incorporate into S5.2. G5.7 Cattle being moved should be rested or allowed to slow if they show signs of exhaustion. S5.2 A person must not drive cattle to the point of collapse.	No further action was agreed
G5.7, G5.8, G5.9,	Evans/Sutton	Upgrade to a Standard. G5.7 Cattle being moved should be rested or	No further action was agreed – guidelines

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
G5.11, G5.13, G5.17	PETA, Vic DEPI	<p>allowed to slow if they show signs of exhaustion.</p> <p>G5.8 Calves less than 30 days old should be handled with care because they may not have developed following behaviours, and may also become easily fatigued.</p> <p>G5.9 Cattle should be returned to feed and water as soon as possible after holding in yards.</p> <p>G5.11 Cattle should be closely supervised when dipping to prevent drowning.</p> <p>G5.13 Hoof paring should be limited to avoid damage to soft tissue.</p> <p>G5.17 Unnecessary cattle handling should be avoided during extreme weather.</p>	<p>promote higher welfare</p> <p>G5.11 – Agreed leave as is – as where do you stop, bulls, old cattle etc. Sufficiently detailed.</p> <p>G5.17 is a repeat of G3.4 No further action was agreed.</p>
G5.14	RSPCA, PETA, WSPA, BAAA	<p>Should be a standard banning permanent tethering.</p> <p>G5.14 Permanent <u>term tethering</u> should be avoided.</p>	<p>No further action was agreed</p> <p>The SRG agreed on the development of a new guideline</p> <p>G5.14a A person tethering cattle should:</p> <ul style="list-style-type: none"> • Ensure the tether is long enough to allow adequate exercise and grazing • Ensure the tether does not become entangled • Inspect the cattle a minimum of once per day • not tether cattle by the leg or foot • ensure cattle have adequate shelter. <p>As requested in meeting drafted new tethering guidelines for consideration.</p>
G5.22	Vic DEPI	<p>G5.22 conflicts with S5.7 (3) which mandates training.</p> <p>G5.22 Operators using electro-immobilisation should undertake formal training and</p>	<p>No further action was agreed – guidelines recommends higher training level</p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		assessment to a high level of competency.	
G5.24, G5.25, G5.27	LSSA, welfare groups, de Fraga RSPCA, Vets	Upgrade to a Standard. Should be replaced with a new Standard banning hot-iron branding. G5.24 Hot-iron branding of wet cattle should be avoided. G5.25 The correct time period of application and temperature of the iron should be used when hot-iron branding. G5.27 Care should be taken with the concurrent application of volatile pour-on treatments when hot-iron branding or applying the electric prod.	No further action was agreed
G5.26	Vic DEPI	Upgrade to a Standard. Should be reworded as a Standard – would be cruelty under POCTA. G5.26 Hot-iron branding of weak or extremely thin cattle should be avoided.	No further action was agreed - no evidence of importance
G5.28	Evans/Sutton	Upgrade to a Standard. G5.28 Ear tagging and tattooing should be done in a way that minimises the risk of infection and tearing of the ear.	No further action was agreed
G5.29	RSPCA	Upgrade to a Standard and should be replaced with a banning of earmarking and tattooing. G5.29 Ear marking and tattooing instruments should be sharp and clean, with relevant hygienic techniques followed.	No further action was agreed

The cattle reference and writing groups agreed a new additional guideline on tethering.

Chapter 6 Castration, dehorning and spaying

S6.1 A person *castrating* or *dehorning* cattle must have the relevant knowledge, experience and skills, or be under the *direct supervision* of a person who has the relevant knowledge, experience and skills.

Castration

S6.2 A person in charge must ensure use of appropriate *pain relief* when *castrating* cattle, unless cattle are:

- 1) less than six months old; or
- 2) less than 12 months old if at their first *yarding*, and where the later age is approved in the jurisdiction.

S6.3 A person must use appropriate tools and methods to *castrate* cattle.

Disbudding and dehorning

S6.4 A person in charge must ensure use of appropriate *pain relief* when *dehorning*, unless cattle are:

- 1) less than six months old; or
- 2) less than 12 months old if at their first *yarding* and where the later age is approved in the jurisdiction.

S6.5 A person must consider the welfare of the *calf* when using *caustic chemicals* for *disbudding* the calf, and must only use it if the *calf*:

- 1) is less than fourteen days old; and
- 2) can be segregated from its mother for four hours after treatment; and
- 3) can be kept dry for 12 hours after treatment; and
- 4) is not wet.

S6.6 A person must use appropriate tools and methods to *dehorn* cattle and *disbud* calves.

Spaying

S6.7 A person *spaying* a *cow* must be a veterinarian or, if permitted in the jurisdiction, be accredited or be under the *direct supervision* of a veterinarian or a person who is accredited.

S6.8 A person in charge must ensure use of appropriate *pain relief* when performing the *flank approach* for *spaying* or *webbing* of cattle.

S6.9 A person must not use vaginal spreaders to *spay* small or immature **female** cattle.

The following changes to standards were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
General	Welfare groups, vets, General Public	<p>Necessary invasive procedures must be performed with pain relief irrespective of age (Welfare groups, vets).</p> <p>All invasive procedures must be done by veterinarians, with pain relief in all ages (Sentient, general public).</p> <p>Ban invasive procedures where the ultimate benefit is measured in convenience of the operator (HSI).</p>	No further action was agreed not practically achievable.
General	Industry	<p>Pain relief for all invasive procedures is not practical and may compromise welfare (AgForce, PGAWA, NSW Farmers, other producer groups)</p> <p>Costs, practicality and enforcement of pain relief are major issues for northern producers</p> <p>Cattle Council, WAFF: Mandating pain relief in extensive systems is impractical and unenforceable because:</p> <p>Lay operators have limited or no access to appropriate pain-relief (particularly S4) compounds.</p> <p>Requiring lay operators to use pain relief when it is not readily available effectively bans the procedure.</p> <p>Having vets perform all the functions listed under these Standards is totally impractical and unaffordable.</p>	<p>No further action was agreed, states legislation in place.</p> <p>Agreed convenience of the operator often has positive welfare implications.</p> <p>Issue of pain relief noted and agreed to go to RG and most likely higher for resolution.</p>
General	NTCA	<p>NTCA raises significant concern regarding Section 6 (castration, dehorning and spaying) and sections 6.2, 6.4, 6.7 & 6.8 as they relate to “pain relief”.</p> <p>NTCA: All standards requiring pain relief should be removed until they are consistent with the resolution below.</p> <p><i>“For pain relief to be included in animal</i></p>	<p>Extracted from Dr C Petherick, UQ</p> <p><i>“Administration of an analgesic provided some alleviation of pain, but for optimal effectiveness it would need to be given 20 to 30 min prior to castration, if administered</i></p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		<p>welfare standards then the pain relief and the process must provide positive welfare outcomes, be accessible, practical and cost effective”.</p> <p>NTCA is of the view: <i>“The use of analgesics and pain relief will not necessarily provide positive animal welfare outcomes, and potentially have the opposite effect.”</i></p> <p>NTCA suggest a better outcome would be to improve the research, development, extension, education and train (RDEET) effort to provide the long-requested animal welfare improvements.</p> <p>Reference: Petherick, JC Pain management in castrated beef cattle MLA project B.AWW.0206 Nov 2011. Accessed 10.12.13 http://www.mla.com.au/Research-and-development/Final-report-details?projectid=15155</p>	<p><i>intramuscularly. This requirement is likely to be difficult to accommodate with current cattle handling procedures, as it would necessitate either double-handling of the animals or a lengthy holding period in the race. Further, ketoprofen was associated with increased blood loss in the surgical castrates, which may be an additional risk for cattle with low haematocrit levels. Ketoprofen administration also had some unexpected consequences; average liveweights of the mature cattle were lower in the ketoprofen treated than saline-treated animals. This is paradoxical given that ketoprofen alleviated pain and has a short period of effect (12-24 hrs). Additionally, lateral lying was seen significantly more in the banded cattle given ketoprofen than other treatments and, at this time, we are unable to explain this finding.”</i></p>
General	AgForce	<p>Until science and pharmaceutical availability advances, current practices of spaying should be maintained. Accreditation or units of competency should be readily available regionally and at low or no cost to laypeople. Any other options would lead to far worse welfare outcomes with old cows unable to rear</p>	<p>Training and accreditation will be a cost to industry as identified in the RIS.</p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		calves. The suggestion within the current Standards is simply not possible in the current operating environment.” Concurrent dehorning is not permitted (LSSA)	
S6.1	RSPCA	Operator must be accredited.	No further action was agreed. Difficult to implement.
S6.2	Various	Move towards pain relief for all ages (AA, RSPCA, general public etc. - with a time limit in the standard - RSPCA) Pain relief for all castration (Edgar’s Mission) Castration <3mo or asap thereafter (RSPCA, AA) S6.2 is impractical and may <i>compromise</i> welfare during handling, restraint and the pain relief process (Bloomfield, AgForce, others): PGA (WA): pain relief is “totally impossible in the remote pastoral rangelands - there is currently no pain relief products that are economic, effective and registered.” Suggested additional wording: “...if the application of pain relief is not offset by stress of handling, restraint and the actual process of pain relief administration” <i>or similar</i> (producer groups) Make S6.2 a Guideline (Canterbury Stud, PGAWA) Remove 12 months requirement and replace with ‘at their first yarding’. P Camp.	No further action was agreed Extensive impracticability of pain relief noted agreed to go to RG and most likely higher. SRG agreed to add the wording “ensure” use “of appropriate” for pain relief.
S6.3	Various	Ban rubber rings Sentient opposes rubber rings (alleges high incidence of complications) – suggests a standard banning their use Define appropriate tools and methods “appropriate tools and methods” should be better defined (several submissions including veterinarians) Insert “that causes the least pain or suffering” after “methods” (AA)	No further action was agreed

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
S6.4	Various	<p>All dehorning/disbudding with pain relief (RSPCA, WSPA, AA, Voiceless, veterinarians, general public)</p> <p>Disbudding only on calves <2mths, dehorn with pain relief up to 6mths if at first yarding (AA)</p> <p>All dehorning of cattle >8 weeks by a veterinarian or accredited technician, with effective pain relief (Heislars - vet)</p> <p>Mandate flystrike prevention when sinus exposed (Heislars)</p> <p>Impractical and may compromise welfare (Bloomfield, PGAWA, AgForce, other producer groups) – same argument as under S6.2 above</p> <p>S6.4(2) should be reworded to read “it is their first yarding, and where the later age is approved in the jurisdiction” (PGAWA)</p> <p>RSPCA proposes that where the procedure is not carried out by a vet, the standard must require that the operator is accredited.</p> <p>PGAWA prefers “A person spaying a cow must be trained and accredited or be under the direct supervision of a person who has the relevant knowledge, experience and skills”</p> <p>S6.8 requires pain relief for flank spaying but not DOT.</p>	<p>Dehorning discussion runs in parallel with castration discussion – TBD</p> <p>Refer LSSA submission under standard 6 (p12) – accreditation scheme proposed by CCA</p> <p>SRG agreed to add the wording “ensure” use “of appropriate” for pain relief.</p> <p>No further action was agreed</p>
S6.5	Various	<p>Disbudding with pain relief (RSPCA, WSPA, AA, general public vets)</p> <p>Ban caustic disbudding (all welfare groups, AVA, NTDPFI)</p> <p>Caustic disbudding strongly supported by industry (DA-ADF, Norco)</p> <p>S6.5(2)- <u>separate from cohorts as well as their mothers, to reduce the risk of accidental contamination</u> (QLD DAFF, TAS DPIWE, Vic DEPI)</p>	<p>No further action was agreed</p> <p>Support standard to remain as it has welfare benefit for the dairy industry.</p> <p>RIS variation discussion.</p> <p>It was agreed that separation of calves is not required in the immediate post treatment period.</p> <p>The risks of cross contamination to sensitive structures on other calves are non-existent.</p>
S6.6	AA	<p>“Appropriate” is meaningless and unenforceable – should at least provide</p>	<p>No further action was</p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		guidance.	agreed
S6.7	Various	<p>In the absence of an approved national accreditation scheme for lay spayers, otherwise meaningless and unenforceable (LSSA) i.e. vet only (AA)</p> <p>Amend to "...be accredited AND be under the supervision of a veterinarian" (AVA) Note- not direct supervision.</p> <p>RSPCA proposes that where the procedure is not carried out by a vet, the standard must require that the operator is accredited.</p> <p>PGAWA prefers "A person spaying a cow must be trained and accredited or be under the direct supervision of a person who has the relevant knowledge, experience and skills".</p>	<p>No further action was agreed.</p> <p>Accreditation scheme proposed by CCA underway. AVA suggestion under vet supervision – agreed not of any consequence.</p> <p>Suggestion of vets being accredited – don't agree vet should be accredited.</p> <p>No Change.</p>
S6.8	Various	<p>All spaying (i.e. DOT) with pain relief (RSPCA, AA, Voiceless, SCTRLHC, general public)</p> <p>For therapeutic reasons by vet only with pain relief (AVA)</p> <p>DOT requires pain relief (AVA)</p> <p>The DOT must only be practised when heavy sedation and effective analgesia are used (Sentient)</p> <p>Flank spaying should be a vet-only procedure (AVA)</p> <p>Ban flank and web spaying (RSPCA, WSPA, Voiceless)</p> <p>Passage webbing for mature cows only, and with pain relief (AA)</p> <p>Remove – impractical (PGAWA)</p> <p>Passage webbing is safe and can be done without pain relief- AVA.</p>	<p>S6.8 – significant discussion within the RIS and issues of supply of pain relief. AGREED RG Discussion.</p> <p>Requires pain relief for flank spaying but not DOT – TBD RIS Various discussion.</p> <p>Currently implies vet only (in absence of an accreditation scheme).</p> <p>SRG agreed to add the wording "ensure" use "of appropriate" for pain relief.</p>
S6.9	Various	<p>"Small or immature" should be defined to assist enforcement (QLD DAFF)</p> <p>Vaginal spreaders must not be used to do this.(AVA)</p> <p>S6.9 A person must not use vaginal spreaders to spay small or immature female cattle.</p>	<p>No further action was agreed - detail on size etc. to be provided in extension material.</p> <p>SRG agreed to delete 'female' as not required for clarity.</p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
New Standard	Majority of welfare groups	New Standard Calves for slaughter must not be castrated.	No further action was agreed. An assured market does not exist in Australia.
New Standard	AVA	New Standard Should be a standard and guideline on spaying of pregnant cattle.	No further action was agreed. Possible guidelines for last month of pregnancy?

No substantial changes to the standards were agreed by the reference group. The minor word changes agreed were for clarity.

In relation to the matters raised in the RIS variations, the following explanation is offered;

C1: pain relief for all spaying	Not supported as a standard	Supported for inclusion in RIS Option C
C2: banning flank spaying/flank webbing	Not supported as a standard	Supported for inclusion in RIS Option C
C5: banning caustic dehorning	Not supported as a standard	Supported for inclusion in RIS Option C

C1: pain relief for all spaying – See sections A2.12 and A3.1 of the Consultation RIS.

On Line survey RIS Question 7 - Do you believe that the benefits achieved under Variation C1, including welfare benefits of pain relief with spaying and reduction in excess regulatory burden, are justified?

No. of responses	Agree	Disagree	Neutral
98	67%	23%	10%

In general it is believed that pain relief for all spaying is difficult to deliver and requires further research and testing in practice. A single recent study has cast doubt on the value of Ketoprofen administration for cattle undergoing surgery. The use of local anaesthetic is regarded as impractical in commercial cattle husbandry settings.

In general it is believed that the extension of the use of pain relief for dropped ovary and per-vaginal spaying does not provide sufficient benefit for heifers and cows if properly managed as required by the proposed standards S6.7, S6.8 and S6.9. The cattle industry recognises the need to minimise the use of surgical spaying and is committed to a significant investment in research for the adoption of alternative non-surgical methods.

C2: banning flank spaying/flank webbing– See sections A2.11, 2.12 and A3.2 of

the Consultation RIS.

RIS Question 8 - Do you believe that the benefits achieved under variation C2, including welfare benefits of banning flank spaying and webbing and reduction in excess regulatory burden, are justified?

No. of responses	Agree	Disagree	Neutral
97	67%	22%	11%

Banning of flank spaying/flank webbing will disallow a valuable spaying option for older cow and smaller heifer management in the north Australian pastoral industry with the current work force skills base. The dropped ovary and per vaginal techniques are alternative methods of spaying that require a higher level of skill to execute and also have limitations with respect to method performance in small cattle and advanced stages of pregnancy. The cattle industry recognises the need to minimise the use of the flank approach and is committed to the adoption of the alternative methods.

C5: banning caustic dehorning– See sections A2.10 and A3.5 of the Consultation RIS.

RIS Question 11 - Do you believe that the benefits achieved under Variation C5, including welfare benefits of banning caustic dehorning and reduction in excess regulatory burden, are justified?

No. of responses	Agree	Disagree	Neutral
102	65%	24%	11%

There is support for the standard as it has welfare benefit for the dairy heifer if correctly performed. In general it is believed that the use of caustic disbudding is not a significant threat to the welfare of calves if properly managed as required by the proposed standard S6.5.

The following changes to guidelines were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
G6.4 (first sentence), G6.11, G6.13	Vic DEPI	Upgrade to a Standard. G6.4 Good hygiene practices should be implemented in relation to facilities, hands, handling and instruments. Disinfectant should be used and changed frequently. G6.11 Cattle should be inspected regularly and with minimal disturbance for signs of post-operative complications during the healing process, and appropriate action taken. G6.13 Calves should be more than 24 hours old when castrated.	No further action was agreed

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
G6.3	Vic DEPI	Replace ‘to’ with ‘of’ G6.3 Surgical procedures should be planned with consideration to <u>of</u> the health and age of cattle, weather, staff availability and facilities, including the use of temporary or permanent yards.	WG Agreed – better English. SRG supported.
G6.6	SRG	Split into 3 dot points G6.6 Equipment for restraining cattle should only be used: <ul style="list-style-type: none"> • for the minimum time necessary, and • with the minimum restraint necessary, and when it is suitable • if it is in good working order. 	Agreed by SRG
G6.9	Vic DEPI	Add ‘avoiding performing surgical procedures in’ G6.9 Infection should be minimised by avoiding muddy or dusty yards, and wet weather.	No further action was agreed
G6.12	SRG	New guideline A person should use the most appropriate tools and least painful method to castrate cattle that is applicable to the production system.	Agreed by SRG.
G6.13	Vic DEPI	Upgrade to a standard G6.13 Calves should be more than 24 hours old when castrated.	No further action was agreed
G6.15	K. Stevens	Delete - impractical and unnecessary – rings work well for rogue (mickey) bulls in remote country. G6.15 Calves more than two weeks old should be castrated by the cutting method in preference to the rubber-ring and tension-band methods.	No further action was agreed
G6.24	Vic DEPI	Add “unless the horn is in-growing or likely to cause the animal injury or distress.” G6.24 Horn regrowth or a scur that has a blunt horn end should not be dehorned or tipped.	No further action was agreed
G6.25	RSPCA AVA	Upgrade to a Standard – permitting DOT only. Preferred wording: <i>The DOT for cattle spaying is the method of choice in heifers.</i> G6.25 Passage webbing or the dropped ovary	WG Agreed to add Passage webbing in guideline. SRG supported.

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		technique (DOT) for cattle spaying should be used in preference to other surgical methods, where possible.	
New guideline	AVA	Should be a guide/standard on spaying of pregnant cattle .	No further action was agreed
New guideline	AVA	<u>G6.26 In mature cows where it is considered there is a greater risk of haemorrhage, "webbing" by the passage approach should be used where possible.</u> Vaginal spreaders must not be used to do this.(AVA)	WG Agreed Add guideline. SRG supported.
New guideline	Heislars	Guideline against dehorning calves destined for slaughter .	No further action was agreed

Minor changes to wording of three guidelines for clarification and two new additional guidelines were agreed by the writing and reference groups.

Chapter 7 Breeding management

S7. 1a A person performing artificial breeding procedures on cattle must have the relevant knowledge, experience and skills, or be under the *direct supervision* of a person who has the relevant knowledge, experience and skills.

- S7.1 A person performing *artificial breeding procedures* on cattle must take reasonable actions to minimise pain, distress or injury.
- S7.2 A person in charge must ensure the *inspection* of calving cattle at intervals appropriate to the production system and the level of risk to the welfare of cattle.
- S7.3 A person in charge must ensure *calving induction* is done under veterinary advice.
- S7.4 A person in charge must ensure that induced calves receive adequate colostrum or be humanely killed at the first reasonable opportunity, and before they are 12 hours old.

The following changes to standards were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
S7.1	Various	Reword <u>A person performing artificial breeding procedures cattle must have the relevant knowledge, experience and skills, or be under the direct supervision of a person who has the relevant knowledge, experience and skills.</u> (Vic DEPI) Amend to remove “reasonable” (LSSA, AA) and insert “any” before “pain” (LSSA) Ban electro-ejaculation (RSPCA et al)	WG Agreed New standard. SRG supported S7.1a No further action was agreed - Use of ‘any’ would amount to total pain block, can’t guarantee this.
S7.2	AVA	“Appropriate to the production system and the level of risk” is unclear – needs to be clear on how and by whom this assessment is made	No further action was agreed
S7.3	Various	Restrict calving induction to “necessary for welfare” only – ban as a management tool (RSPCA, WSPA, AA, Sentient, de Fraga et al and SCTRLHC, NTDPIF) Restrict induction to veterinarians only (Sentient) Replace “advice” with “supervision” (Vic DEPI) Calving induction has both welfare and	No further action was agreed - Industry is working to reduce this as much as possible. Significant cost if outright banned. DA and ADF working on extension material.

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		production benefits in seasonally calving herds (WVG)	No further action was agreed - all supervision standards is now 'direct supervision'.
S7.4	LSSA	LSSA alleges inconsistency with G2.17 – suggests remove “reasonable opportunity” and reword – see LSSA comments under S3.3 above.	No further action was agreed incorrect interpretation.
New standard	AVA	New Standard proposed to require close observation of cattle in the immediate post dry off period for a defined period of time.	No further action was agreed – covered in inspection standard. Not considered to be a major issue.
New standard	Vic DEPI	New Standard proposed to require competency provisions as per S6.1.	No further action was agreed
New standard	RSPCA	New Standard proposed to ban electro-ejaculation	No further action was agreed. Use of electro-ejaculation is required.
Note under standard	SRG	Delete as repeats definition of artificial breeding	Agreed.

The writing and reference group has responded to submissions for a higher level of skills assurance for a person performing artificial breeding procedures on cattle. The new agreed standard is based on existing standards that address this degree of welfare issue. This is not believed to add any cost to current cattle enterprises as it is consistent with current duty of care and practice.

In relation to the RIS variation, the following explanation is offered;

C6: banning induction of early calving except for veterinary requirements - See sections A2.14 and A3.6 of the Consultation RIS.

C6: banning induction of early calving except for veterinary requirements	Not supported as a standard	Supported for inclusion in RIS Option C
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RIS Question 12. Do you believe that the benefits achieved under variation C6, including welfare benefits of banning induction of early calving except for veterinary requirements and reduction in excess regulatory burden, are justified?

No. of responses	Agree	Disagree	Neutral
103	67%	20%	13%

In general it is believed that the limited use of induction is a necessary management tool to permit a small portion of the herd to be realigned with seasonal pasture conditions for best management of the cow. The impact of an early induction to the welfare of cows and calves is lessened if properly managed as required by the proposed standards S7.2, 7.3 and 7.4. The dairy cattle industry recognises the need to minimise the use of induction and is committed to a significant investment in research and extension for the adoption of alternative strategies in seasonal calving herds as part of the National Dairy Industry Animal Welfare Strategy.

The following changes to guidelines were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
G7.1	de Fraga Vic DEPI	Upgrade to a Standard. Replace 'technician' with 'person' G7.1 Technicians <u>Persons</u> responsible for breeding management should have an understanding of the reproduction and behaviour of both the cow and the bull.	No further action was agreed SRG supported - agreed.
G7.2	Vic DEPI	Include "reduce the risk of metabolic diseases" G7.2 In the last 4–6 weeks of pregnancy, management practices should minimise stress on cows and reduce metabolic diseases.	Supported – in place.
G7.4	Sentient, Hindes	Upgrade to a Standard. G7.4 Care should be taken to minimise calving difficulties by adopting suitable management practices, which may include: <ul style="list-style-type: none"> • selecting heifers for mating only when they have reached the minimum target weight for the breed • avoiding overfeeding or underfeeding pregnant cows and heifers • avoiding mating heifers to bulls known to sire large birth weight calves • supervising cows and heifers close to 	No further action was agreed.

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		<p>calving, where possible, and early intervention if required</p> <ul style="list-style-type: none"> selecting bulls rated for calving ease. 	
G7.5	Sentient, Voiceless and Vic DEPI	<p>Must be a Standard (Voiceless) or delete as a guideline as the issue is captured in S3.3 (as per downer cows). It is in conflict with cruelty offence legislation (Vic DEPI).</p> <p>G7.5 Cows that receive severe injuries during calving or that are affected by a severe adverse outcome (prolapsed uterus, unable to remove calf) should receive urgent treatment, or be humanely killed without delay.</p>	No further action was agreed
G7.6	Vic DEPI	<p>Must be a standard (as per S3.3 and S11.3). Cruelty if left to suffer.</p> <p>G7.6 Weak or orphaned calves with very little chance of survival should be humanely killed <u>without delay</u>.</p> <p>S3.3 A person in charge must ensure appropriate treatment for sick, injured or diseased cattle at the first reasonable opportunity.</p> <p>S11.3 A person in charge of cattle suffering from severe distress, disease or injury that cannot be reasonably treated must ensure that the cattle are killed at the first reasonable opportunity.</p>	<p>WG Agreed to add 'without delay'.</p> <p>SRG supported.</p>
G7.8	Sentient	<p>Upgrade to a Standard and Add 'without delay (G7.8)</p> <p>G7.8 Herd management strategies should be adopted to minimise or eliminate the need to induce calving.</p>	No further action was agreed
G7.9	Vic DEPI	<p>The second part of this guideline should be a Standard (as per S3.3) or deleted otherwise in conflict with S3.3</p> <p>G7.9 Cows subject to an induction program should be inspected twice daily. Any cow requiring calving assistance or treatment should receive this intervention <u>at the first opportunity without delay</u>.</p>	<p>WG Agreed to add 'without delay'.</p> <p>SRG supported.</p> <p>No further action was agreed G7.9 exceeds the standard S3.3 and POCTA Vic POCTA. 9 (1)(h) abandons an animal of a</p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		S3.3 A person in charge must ensure appropriate treatment for sick, injured or diseased cattle at the first reasonable opportunity.	species usually kept in a state of confinement or for a domestic purpose; or (i) is the owner or the person in charge of a sick or injured animal and unreasonably fails to provide veterinary or other appropriate attention or treatment for the animal; or...
G7.10	AVA, Various	Upgrade to Standard, Is inconsistent with G7.8 and G7.9 , which refer to induction in the context of herd fertility programs. G7.10 Calving induction should only be done when necessary for the welfare of the individual cow or calf.	No further action was agreed
G7.11	Sentient	Upgrade to a Standard and Add 'during the mating period' G7.11 Bulls should be checked at regular intervals for injuries and disease.	No further action was agreed
G7.12	Vic DEPI Canterbury Assoc studs	Convert to a Standard and add , "for stress or injury during and after the procedure and treated as necessary" – and/or ban serving capacity tests. G7.12 The welfare of teaser cattle used in bull-serving ability tests should be closely monitored. Ban bull serving ability tests.	No further action was agreed No further action was agreed. Libido tests are not commonly used. Serving ability testing is still required.
New Guideline	AVA RSPCA	Need guidelines for use of electro-ejaculators and serving ability tests .	No further action was agreed. No viable proposals made.

Minor changes to wording of three guidelines for clarification were agreed by the writing and reference groups.

Chapter 8 Calf-rearing systems

S8.1	A person in charge must ensure the feeding and *inspection* of calves in *calf*-rearing systems <u>are performed</u> daily.
S8.2	A person in charge must ensure <u>that</u> calves that are housed in pens can turn around, lie down and fully stretch their limbs.
S8.3	A person in charge must ensure sufficient iron in the diet to prevent anaemia in calves in veal production systems.
S8.4	A person in charge must not allow the faeces and urine of calves housed in indoor systems to accumulate to the stage that compromises *calf* health and welfare.

The following changes to standards were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
S8.1	Vic DEPI	Ambiguous as written. Move “daily” to precede “feeding and inspection” S8.1 A person in charge must ensure the feeding and inspection of calves in calf-rearing systems <u>are performed</u> daily.	WG Agreed to a change as indicated for better English. SRG supported.
S8.2	RSPCA, AA	Ban individual Pens S8.2 A person in charge must ensure <u>that</u> calves that are housed in pens can turn around, lie down and fully stretch their limbs.	WG Agreed change for better English. SRG supported.
S8.4	Voiceless, WSPA	Too vague to be useful or enforceable. Leaves too much room for discretion and should be qualified . E.g. “A person in charge must not allow the faeces and urine of calves housed in indoor systems to accumulate for more than 24 hours. If calf health and welfare is compromised, immediate action must be taken to clean the area and attend to calves.”	No further action was agreed - not agreed to the variety of different housing systems (e.g. straw)
New Standard	Evans/Sutton	New Standard “calves must not be housed individually for commercial purposes”.	No further action was agreed

The writing and reference group has responded to submissions for a higher level of clarity with minor changes to two standards. This is not believed to add any cost to current cattle enterprises.

The following changes to guidelines were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
G8.1	de Fraga, Vic DEPI, Evans, Sutton, Sentient	Upgrade to a Standard. G8.1 Calves removed from cows should receive adequate colostrum within 12 hours of birth, with the first administration occurring as soon as possible.	No further action was agreed
G8.2	SRG	Delete “if in doubt” The quality of colostrum should be checked. if in doubt.	Agreed by SRG
G8.3	Vic DEPI, Evans, Sutton, Sentient	Upgrade to a Standard. G8.3 If artificial feeding of new-born calves is required, the calves should be supervised until they are successfully trained to self-feed.	No further action was agreed
G8.6	RSPCA, ALQ, Vic DEPI, Sentient	Delete Upgrade to a Standard. G8.6 Where there are two or more calves on a property, calves housed in single pens should be able to see neighbouring calves.	No further action was agreed
G8.10	Vic DEPI, Evans, Sutton	Upgrade to a Standard. G8.10 Feeding equipment should be hygienically maintained.	No further action was agreed
G8.11	Vic DEPI WSPA, Evans, Sutton	Treatment should be made a Standard (in line with S3.3) or deleted as in conflict with S3.3. G8.11 Calves that become sick should be segregated and treated immediately. S3.3 A person in charge must ensure appropriate treatment for sick, injured or diseased cattle at the first reasonable opportunity.	No further action was agreed - Issue is timing guideline promotes higher welfare.
G8.12	Vic DEPI, Evans, Sutton	Minimum floor space should be a Standard G8.12 Floor area of 1.5–2.0 m ² should be provided for each calf in group pens to permit self-grooming and prevent overcrowding. An area of 2.0m ² should be provided for calves in individual pens.	No further action was agreed
G8.13	de Fraga,	Clean and dry environment should be a	No further action was

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
	Evans, Sutton, Sentient	Standard in calf-rearing operations. G8.13 Calves should be raised in an environment that is: <ul style="list-style-type: none"> • clean • dry • well drained • provided with sufficient bedding • draught free and well ventilated • free of projections that may cause injury. 	agreed
G8.15	Sentient	Should be a standard Change from 'be supported by' to 'be fed' a high protein diet. G8.15 Very early weaning of calves should be supported by a high protein diet.	No further action was agreed

Minor changes to wording of one guideline for clarification was agreed by the writing and reference groups.

Chapter 9 Dairy management

S9.1	A person in charge must ensure the daily *inspection* of lactating dairy *cows*.
S9.2	A person in charge must implement appropriate actions to minimise *heat stress* of cattle.
S9.3	A person must *tail dock* cattle only on veterinary advice and only to treat injury or disease.
S9.4	A person in charge must ensure dairy cattle that are kept on feed pads for extended periods have access to a well-drained area for resting.

The following changes to standards were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
S9.2	AA	"Appropriate" is unenforceable – must re-word (AA).	No Further Action as considered by the WG and RG previously.
S9.3	Sentient, Vic DEPI	Add "The procedure must only be performed by a veterinarian, using appropriate analgesia and anaesthesia" Reword for clarity: "A person must not tail-dock cattle except on veterinary advice...."	No further action was agreed - addressed the suggestion of "except" or "only" agreed "only" emphasizes more.
S9.4	Vic DEPI, AA	The term " Feed pad " is too specific / narrow. Consider using "free stall barns" or "dairy feedlots". Delete "for extended periods" and add "Cattle must not be kept on feed pads permanently" .	No further action was agreed - as cattle are not on feed pads permanently.
New Standard	(WSPA, de Fraga etc.)	Need a new standard to mandate continuous access to clean water and shade/shelter for dairy cattle.	No further action was agreed
New Standard	Various AW/AR groups	New Standard - Mandate mastitis and lameness programs.	No further action was agreed

The writing and reference group did not agreed to any changes to standards.

The following changes to guidelines were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
G9.2-G9.6	Several AW groups, Sentient	<p>Mandate mastitis and lameness programs – i.e. G9.2-9.5 should be converted to Standards.</p> <p>G9.2 The milking technique should minimise the risk of discomfort, injury and disease.</p> <p>G9.3 A lameness management strategy should be implemented and should include practices for prevention, early detection and effective treatment.</p> <p>G9.4 Lameness assessment and/or hoof inspections should be conducted regularly and hoof trimming carried out when necessary.</p> <p>G9.5 A mastitis management strategy should be implemented and should include practices for prevention, early detection and effective treatment.</p>	No further action was agreed
G9.1	Evans, Sutton	<p>Upgrade to a Standard.</p> <p>G9.1 Milking machinery and equipment should be regularly tested and maintained.</p>	No further action was agreed – Covered in food safety standards
G9.6	Sentient	<p>Upgrade to and standard and “hot weather should be better defined”.</p> <p>G9.6 During hot weather, access to drinking water should be available at all times.</p>	No further action was agreed
G9.8	Vic DEPI, Sentient, Evans, Sutton	<p>Add “if deemed necessary”: not all need removal. Upgrade to a standard</p> <p>G9.8 Extra teats should be expertly and hygienically removed as soon as they can be identified- <u>if deemed necessary</u>.</p>	WG Agreed add “if deemed necessary”. SRG supported.
G9.9	Sentient, Evans, Sutton	<p>Upgrade to a Standard.</p> <p>G9.9 Calving in free stalls should be avoided.</p>	No further action was agreed
New Guideline	AVA	<p>New Guideline</p> <p>Consider including a guideline for a contingency plan for power interruption, milk pick-up or other issues that may prevent or disrupt timely milk harvesting of lactating dairy cattle.</p>	No further action was agreed – considered covered by chapter 3 (G3.1).

Minor changes to wording of one guideline for clarification was agreed by the writing and reference groups.

Chapter 10 Beef feedlots

S10.1	A person in charge must ensure a minimum area of 9 m ² per *Standard Cattle Unit* for cattle held in external pens.
S10.2	A person in charge must ensure that the diet composition and quantities fed are recorded, and that records are maintained for the duration of the feeding period of each group of cattle.
S10.3	A person in charge must ensure feed is available daily to cattle in the *beef feedlot*.
S10.4	A person in charge must do a risk assessment each year for the heat load risk at the feedlot, and implement appropriate actions to manage ongoing heat load risk.
S10.5	A person in charge must have a documented *Excessive Heat Load Action Plan*, and must implement appropriate actions in the event of a heat load emergency.
S10.6	A person in charge must have a documented contingency plan in case of failure of feed or water supply, and must implement appropriate actions in the event of feed or water supply failure.
S10.7	A person in charge must have a documented contingency plan in case of an emergency animal disease, and must implement appropriate actions in the event of an emergency animal disease.
S10.8	A person in charge must ensure the daily *inspection* of all cattle within the feedlot.
S10.9	A person in charge must ensure the appropriate management of calves born in the feed yards, to ensure the welfare of the calves.
S10.10	A person in charge must ensure the cleaning of feed yards and maintenance of surfaces on a planned basis, to ensure that pen surfaces can drain freely.

The following changes to standards were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
S10.1	Various	Amend to incorporate G10.1 (RSPCA, Sentient, Voiceless, Evans/Sutton) – i.e. convert G10.1 to a Standard mandating third-party audited QA Amend to 15sqm (Grandin/AA); 14sqm (Voiceless) Fails to address the need for “enrichment	No further action was agreed - scientific evidence states 9m2 ok for welfare – Canada is wetter. Enrichment strategy No further action was

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		<p>and mental stimulation”– amend “to additionally require persons in charge to ensure that external pens are sufficiently enriched to meet the cattle’s psychological needs” (PETA).</p> <p>S10.1 A person in charge must ensure a minimum area of 9 m2 per Standard Cattle Unit for cattle held in external pens.</p>	agreed as no habitual stereotypic behaviours seen - no science.
S10.2	Voiceless	Insert “regularly” before “recorded”	No further action was agreed
S10.3	Various	<p>Amend to prescribe roughage content – RSPCA</p> <p>Insert “fresh” before “feed” (Voiceless)</p> <p>Add “appropriate and adequate quantity and quality” before “feed” (Vic DEPI)</p>	No further action was agreed discussed previously and covered in S2.1
S10.4 - S10.5	Various	<p>Must require shade in feedlots to manage heat load (RSPCA, WSPA, AA, Saklani, de Fraga et al).</p> <p>EHL Action Plan should define “appropriate actions” (Heislars- vet/cattle producer)</p> <p>EHL Action Plan should also include capacity for sun protection (shade cloth, sprinkler/fan or other) - Heislars</p>	No further action was agreed risk assessment process – state of the art system at the moment, happy to review further science.
S10.7	AVA	Queries why S10.7 is included for feedlots, but not for any other livestock production systems.	No further action was agreed - Reflects intensive nature of business. Covered in risk assessment, feedlot higher welfare/issue.
S10.9	Evans/Sutton	Amend to read , “A person in charge must ensure pregnant cows are identified and placed in a safe, comfortable area to calve and that appropriate management of newborn calves is provided to ensure their welfare”.	No further action was agreed - Leave as gives options and doesn’t describe a process.
S10.10	Vic DEPI	Remove – no relevance to welfare	No further action was agreed - suck in mud, relevance to welfare yes, disease etc.

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
New Standard	Various	Proposed new Standard – ban pregnant cows in beef feedlots (Saklani and followers)– note RSPCA withdrew this proposal Mandate pregnancy testing before entry – WSPA, AVA	No further action was agreed. Covered by S10.9.

The writing and reference group has not agreed to any changes to the standards.

The following changes to guidelines were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
Definition	Numerous	It is unclear whether “containment areas”, which are generally used during drought feeding, are covered under this section or not (Vic DEPI). Also need to clarify status of “export holding yards” (Northern Australia) - ASEL requires lower minimum area (NTDPIF). Beef feedlot - A confined yard area with watering and feeding facilities where cattle are completely hand or mechanically fed for the purpose of beef production.	No further action was agreed - Considered adequately defined.
G10.2	Vic DEPI	Add dot point: management of pregnant heifers and cows G10.2 Feedlot operators should document aspects of a beef feedlot management plan that is not already required to be documented in the standards, including: <ul style="list-style-type: none"> • frequency of cleaning ❖ feed yards ❖ water troughs ❖ feed troughs ❖ drains, sedimentation and holding ponds • details of the records maintained and practices employed to manage the health of cattle held within the feedlot, including: <ul style="list-style-type: none"> ❖ receival and induction ❖ monitoring/inspection 	No further action was agreed

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		<ul style="list-style-type: none"> ❖ disease or injury diagnosis and all treatments of cattle, including the method and records used to ensure the observance of withholding periods and/or export slaughter intervals for any chemical used ❖ mortality and post mortems ❖ biosecurity/disease risk mitigation measures. <p><i>Note:</i> The requirements are fulfilled by the National Feedlot Accreditation Scheme.</p>	
G10.4	RSPCA	<u>Mixing of cattle should be minimised and bullying behaviour should be managed by segregation.</u>	WG Agreed modified guideline on bullying and mixing. SRG supported.
G10.3, G10.6, G10.8, G10.9, G10.11, G10.12, G10.14	<p>Sentient & PETA for all</p> <p>Evans, Sutton</p> <p>Vic DEPI</p> <p>Vic DEPI</p> <p>RSPCA</p> <p>Evans, Sutton</p>	<p>Upgrade to a Standard.</p> <p>G10.3 All cattle should be observed standing and moving during daily inspections.</p> <p>G10.6 New arrivals to a feedlot should be closely inspected for injury and illness.</p> <p>G10.8 Heavily pregnant cattle should be transferred to a pen with lower stocking density or to a paddock before calving.</p> <p>G10.9 Calves born in feed yards should be segregated with their mothers or humanely killed.</p> <p>G10.11 Stale or spoilt feed should be removed daily.</p> <p>G10.12 Changes in diet should be managed to minimise digestive upset to cattle.</p> <p>G10.14 Water troughs should be inspected daily and cleaned regularly.</p> <p>G10.17 Heat load risk assessments should be documented and include:</p> <ul style="list-style-type: none"> • site climatic factors for the feedlot location • animal factors including genotype, coat colour, days on feed and health status 	<p>No further action was agreed</p> <p>No further action was agreed</p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		<ul style="list-style-type: none"> • management factors, which may include the provision of shade, provision of additional water troughs, water temperature, ration type and manure management practices • each class of cattle at the feedlot. <p>G10.18 Feedlot operators should develop, document and implement routine management procedures to reduce the excessive heat load risks identified before they occur.</p> <p>These proactive strategies should include:</p> <ul style="list-style-type: none"> • identification of at-risk cattle source regions and groups of cattle • specific selection of cattle for summer feeding programs • establishment and maintenance of facilities such as shade, sprinklers, weather stations and emergency watering troughs • implementation of summer diet and feeding programs • implementation of strategic pen-cleaning programs • excessive heat load training and management of personnel • implementation of monitoring programs of weather, cattle behaviour, heat load index (HLI) and accumulated heat load units (AHLU) Index. 	No further action was agreed
G10.10	Vic DEPI	<p>Relevance to welfare? Delete?</p> <p>G10.10 Feed yard facilities should comply with the requirements of the National Beef Cattle Feedlot Environmental Code of Practice, 2nd edition, as amended or superseded.</p>	No further action was agreed
G10.16	Vic DEPI	<p>Change ‘observe; to ‘exceeding’</p> <p>G10.16 Feedlot operators should manage heat load risk by observing the excessive heat load specific standards of the National Feedlot Accreditation Scheme.</p>	No further action was agreed. To promote higher welfare than S10.5
New Guideline	AVA	<p>“Ensure that female cattle on feed are either not detectably pregnant or confirmed as</p>	No further action was agreed Covered by

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		pregnant no more than 100 days gestation prior to induction into the beef feedlot to avoid the adverse consequences that arise from having calving females and calves born in a beef feedlot environment”.	S10.9
New Guideline	WSPA,AVA	Mandate pregnancy testing before entry.	No further action was agreed
New Guideline	RSPCA	Standard to mandate socialisation or ‘acclimation’ (for cattle) into neighbouring pens	No further action was agreed no established proof that it has welfare benefit for the majority of feedlot cattle.

Minor changes to wording of one guideline for clarification was agreed by the writing and reference groups.

Chapter 11 Humane killing

S11.1	A person in charge must ensure killing methods for cattle result in rapid loss of consciousness, followed by death while unconscious.
S11.2	A person must have the relevant knowledge, experience and skills to be able to humanely kill cattle, or be under the *direct supervision* of a person who has the relevant knowledge, experience and skills, unless: <ol style="list-style-type: none"> 1) the cattle are suffering and need to be killed to prevent undue suffering; and 2) there is an unreasonable delay until *direct supervision* by a person who has the relevant knowledge, experience and skills is possible <u>becomes available</u>.
S11.3	A person in charge of cattle suffering from severe distress, disease or injury that cannot be reasonably treated must ensure that the cattle are killed at the first reasonable opportunity.
S11.4	A person killing cattle must take reasonable action to confirm the animal is dead.
S11.5	A person killing a *calf* by a blow to the forehead must first ensure that the *calf* is less than 24 hours old <u>and only use this method when no other humane killing methods are reasonably available</u> .

The following changes to standards were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
S11.2	Vic DEPI	Replace ‘possible’ with ‘available’ S11.2 A person must have the relevant knowledge, experience and skills to be able to humanely kill cattle, or be under the direct supervision of a person who has the relevant knowledge, experience and skills, unless: <ol style="list-style-type: none"> 1) the cattle are suffering and need to be killed to prevent undue suffering; and 2) there is an unreasonable delay until direct supervision by a person who has the relevant knowledge, experience and skills <u>becomes available</u>. is possible. 	WG Agreed change for consistency and improved English. SRG supported.
S11.3	LSSA, AA	Remove “at the first reasonable opportunity” (LSSA, AA) Insert “must take reasonable steps to” before “ensure” and “as soon as	No further action was agreed - discussed previously.

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		practicable ” after “killed” (LSSA)	
S11.4	Evans/Sutton, Vic DEPI	Replace “reasonable” with “appropriate” (Evans/Sutton) Omit “take reasonable action to” (Vic DEPI)	No further action was agreed - discussed previously
S11.5	Various	Science is disputed by welfare groups, Sentient and others, who claim S11.1 cannot be achieved by head trauma at any age (quote AVMA euthanasia guidelines) Awkward wording (Vic DEPI) Add “unless in an emergency and no other humane killing method is available” (Bloomfield) Delete – covered by S11.1 (Cattle Council, NSW Farmers) S11.5 A person killing a calf by a blow to the forehead must first ensure that the calf is less than 24 hours old <u>and only (use this method) when no other humane killing methods are reasonably available.</u>	WG Agreed to add a clause for an emergency and no other approved killing methods available – developed as indicated below. SRG supported.
New Standard	BAAA	New Standard should prohibit slaughter by bleeding out of a conscious animal	No further action was agreed S11.1 achieves this outcome

The writing group has responded to submissions for a higher level of clarity with revisions to two standards and several important revisions to the guidelines. This is not believed to add any cost to current cattle enterprises.

S11.2 has been amended for clarity.

S11.5 has been revised to emphasize the need to use blunt force trauma as a last resort killing method when other more reliable methods may not be reasonably available.

The following changes to guidelines were suggested:

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
G11.1	RSPCA, Jubb	Upgrade to a Standard, and remove reference to temporal method (does not work	Agreed - Remove reference to the temporal

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
		<p>in adult cattle)</p> <p>G11.1 Recommended methods of humane killing include:</p> <ul style="list-style-type: none"> • for adult cattle <u>and calves</u> — close-range firearms use to the brain (including the temporal position) or captive bolt to the brain (see Figure11.1) • for calves — firearms or captive bolt (see Figure11.1). 	<p>method – more challenging method and difficult to achieve unless have sufficiently powerful firearm therefore not suitable for these guidelines. Remove reference to c temporal method in diagrams.</p> <p>The SRG agreed to combine the dot points.</p>
G11.2	AHA	<p>Add brainstem location</p> <p>G11.2 The preferred option for humane killing should be a firearm directed to the frontal position of the head. <u>The brainstem should be targeted and it lies midway along an imaginary line drawn between the base of the ears.</u></p>	<p>The dot point in the diagram indicates this.</p> <p>SRG supported.</p>
G11.3	Jubb	<p>Recommend confirming death by observation of four things only to keep it simple, easy and memorable: 1. no eye movement, 2. no blink reflex, 3. fixed dilated pupils, and 4. no breathing for at least 5 minutes (3 minutes is too short, some will recover their breathing after a long delay)</p> <p>G11.3 Three or more signs should be observed to determine whether the method used for humane killing has caused death.</p> <p><i>Note:</i></p> <p>Signs of death include:</p> <ul style="list-style-type: none"> • loss of consciousness and deliberate movement, <u>including eyes</u> • absence of a corneal ‘blink’ reflex when the eyeball is touched, or maximum dilation of the pupil • absence of rhythmic respiratory movements for at least <u>three-five</u> minutes • absence of a heartbeat after three minutes • absence of a pulse after three minutes. 	<p>WG Agreed change to keep it simple.</p> <p>SRG supported.</p>

I/d	Submitted by	Suggested Revision	Recommendation / Action Taken / Revised Content
G11.4	Jubb, Evans, Sutton	<p>Upgrade to a Standard and Thoracic stick is inefficient and difficult in adult cattle. The recommended bleeding cuts for cattle are the throat cut to sever both carotids in the upper neck, or the lower neck cut (stick) to sever one carotid low down on the neck near the thoracic inlet where its diameter is large.</p> <p>G11.4 Bleeding out of unconscious cattle should be done using a suitable, sharp knife. The thoracic stick method should be used.</p>	<p>WG Agreed remove reference to the thoracic stick method.</p> <p>SRG supported.</p>
General issues	Jubb, Sentient, Voiceless	<p>“Bleeding out of cattle without pre-stunning.... must only be done as a last resort using a suitable, sharp knife. Exemptions must not be allowed on the grounds of religious slaughter”</p> <p>Existing S&G side-view diagrams are anatomically incorrect - use MLA diagrams</p> <p>Poll shots with captive bolt in bulls and heavy cattle should be avoided as the bolt in most models is too short (only 55 mm penetration depth)</p> <p>Amend “Captive bolt devices” – it is irrelevant (not practical) to link the length of the bolt to the class of cattle. Most models penetrate to a maximum depth of 55 mm (2 ¼ inches). The diameter and velocity of the bolt are the important determinants of killing power, not the length of the bolt.</p> <p>The S&G do not provide for ritual slaughter. This should be addressed so that facilities producing halal and kosher meat will not be left entirely without welfare guidance. Ritual slaughter is currently legal in all States and Territories.</p>	<p>No further action was agreed</p> <p>Diagrams are representational but will be revised.</p> <p>Revised</p> <p>No further action was agreed</p>

Minor changes to wording of three guidelines and revision to the diagrams were for agreed by the writing and reference groups for clarification.

APPENDIX 1 - LIST OF NOTED SUBMISSIONS AND ACRONYMS

Reference Group Members	
AA	Animals Australia
ADF & DA	Australian Dairy Farmers Ltd and Dairy Australia
Agforce	Agforce Queensland
ALFA	Australian Lot Feeders Association
ALPA	Australian Livestock & Property Agents Association
ALRTA	Australian Livestock & Rural Transport's Association's
AMIC	Australian Meat Industry Council
AVA	Australian Veterinarians Association
CCA	Cattle Council of Australia
DEPI VIC	Department of Primary Industries Victoria
DPIF NT	Department of Primary Industries and Fisheries
DPIPWE TAS	Department of Primary Industries & Water, Tasmania
NSW DPI	Department of Primary Industries NSW
QLD DAFF	Department of Primary Industries Queensland
RSPCA	RSPCA Australia
Other organisations making submissions	
AACT	Against Animal Cruelty TAS
ALQLD	Animal Liberation QLD
BAAA	Ballarat Animal Advocates Association
CABS	Canterbury and Associated Braham studs

CAA	Cat Alliance of Australia Inc.
Edgar	Edgar's Mission
DIG	Far North Coast Dairy Industry Group
FA	Fonterra Australia
HIS	Humane Society International
LSSA	Law Society of South Australia
LSA	Livestock South Australia
NSWFA	New South Wales Farmers' Association
Norco	Norco Co-operative Limited
NPCG	Northern Pastoral Company Group
NRCLC	Northern Rivers Community Legal Centre
NTCA	Northern Territory Cattlemen's Association
NSWYL	NSW Young Lawyers Animal Law Committee
PGAKB	Pastoralists and Graziers Association Kimberly Branch
PGAWA	Pastoralists and Graziers Association of Western Australia
PETA	PETA Australia
PAM	Port Adelaide Monitors
QDO	QLD Dairy Farmers Association
RSPCA SA	RSPCA South Australia
SADA	SA Dairy Farmers Association
Sentient	Sentient – the Vet Institute for Animal Ethics
STCRLHC	South Coast And Tablelands Regional Livestock Health Committee
TFGA	Tasmanian Farmers' & Graziers' Association
UDV	United Dairy Farmers of VIC

VA	Vegan Australia
VFF	Victorian Farmers Federation
Voiceless	Voiceless Limited
WAFF DS	WA Farmers Federation Dairy Section
WAFF MS	WA Farmers Federation Meat Section
WVC	Warrmambol Vet clinic
WSPA	World Society for the Protection of Animals
Individual submissions	
	Alicia Sutton
	Carole de Fraga
	Chris Heislars
	Di Evans
	Glan Lines
	Leonard Martin
	Phill Seiler
	Tristian Jubb

APPENDIX 2 - PICTORIAL REPRESENTATION OF STANDARDS AND GUIDELINES DEVELOPMENT PROCESS

