

Prevention of Cruelty to Animals – Draft Regulations 2019

WOOLPRODUCERS
AUSTRALIA

Animal Welfare Victoria
Department of Jobs, Precincts and Regions
GPO Box 4509
Melbourne Vic 3001

Via email only: animal.welfare@agriculture.vic.gov.au

20 September, 2019

To whom it may concern,

Re: Prevention of Cruelty to Animals – Draft Regulations 2019

WoolProducers Australia (WoolProducers) welcomes the opportunity to provide this submission regarding the *Prevention of Cruelty to Animals – Draft Regulations 2019*.

WoolProducers is the peak industry council for the wool industry. Our membership is comprised of the industry's commercial, superfine and stud breeding sectors. WoolProducers is nationally representative through our State Farming Organisation members and three democratically elected Independent Directors. WoolProducers' policy areas include animal health and welfare, biosecurity, pest management control, natural resource management, drought policy, emergency animal disease outbreak preparedness, and industry development including research and trade.

WoolProducers strongly believe that there must be consistency in regulation regarding animal welfare, which is why we contributed to funding the development of the Australian Animal Welfare Standards for Sheep and dedicated significant resources to their development.

As members of both the Writing and Reference Group for the development of the Australian Animal Welfare Standards and Guidelines for Sheep, WoolProducers is well placed to offer further comment in reviewing the *Prevention of Cruelty to Animals – Draft Regulations 2019* for national consistency for issues relating to sheep should this be requested by the Department of Jobs, Precincts and Regions.

WoolProducers has reviewed the *Prevention of Cruelty to Animals – Draft Regulations 2019* and associated Regulatory Impact Statement (RIS) provided by the Department of Jobs, Precincts and Regions for consideration with regard to implementation before the current *Prevention of Cruelty to Animals Regulations (POCTA Regulations) 2008* sunsets on 15 December, 2019.

WoolProducers supports the submission and views of our member, Victorian Farmers Federation into this process, but will take the opportunity to make specific comment on the sheep relevant provisions.

8 Sheep

(1) A person must not allow the fleece of a sheep to grow to a length greater than twice the average annual growth for the breed of sheep or more than 250mm (whichever is shorter).

WoolProducers are supportive of the intent of this proposed regulation but would prefer to see it worded consistently with the Australian Animal Welfare Standards for Sheep, which is:

55.4 *A person in charge must ensure a sheep is shorn before the wool length is greater than twice the average annual growth for that breed.*

During the development of this Standard it was agreed by the Writing Group that it was appropriate not to include a prescriptive length of wool due to the varying wool growth rates amongst different breeds of sheep.

WoolProducers believes that the wording of the existing Standard supports the intent of the proposed regulation as stated in the *Prevention of Cruelty to Animals – Draft Regulations 2019* but is more practical to implement.

(2) A person must not mules a sheep unless the sheep is administered pain relief with a product that has been registered for use on sheep by the Australian Pesticides and Veterinary Medicines Authority.

WoolProducers Australia are very supportive of the proposed regulation relating to pain relief for mulesing sheep as it is consistent with WoolProducers policy, however this support is contingent on the mulesing definition remaining the same as stated in the Australian Animal Welfare Standards for Sheep, which is as follows:

Mulesing (mules, mulesed)

The removal of skin from the breech and/or tail of a sheep with mulesing shears.

WoolProducers strongly oppose the proposed definition in the draft *POCTA Regulations 2019* and will not support this proposed regulation if the definition remains as stated in the draft regulations.

National consistency in terminology is essential and the definition under the Australian Animal Welfare Standards for Sheep has been endorsed by all state and territory jurisdictions. It is also the definition used on the National Wool Declaration (NWD) and its associated audit function, the NWD Integrity Program, which is administered by the Australian Wool Exchange (AWEX). Any variance in the mulesing definition will render the function and integrity of this industry driven and funded program as meaningless. This is completely unacceptable to the Australian wool industry and supply chain.

It must be understood that mulesing is a standalone procedure and the proposed definition under *POCTA Regulations 2019* refers to breech modification. Since 2005 the Australia wool industry has invested over \$30 million of predominantly woolgrower's money, into finding an alternative to mulesing with the understanding that breech modification is a separate and distinct process to

mulesing. A change in the agreed definition of mulesing will mean that this would be a gross waste of money.

The intent of the current definition of mulesing under the Australian Animal Welfare Standards for Sheep also prohibits people using anything other than mulesing shears to conduct mulesing, meaning that if a person was to use a knife (or other implement) to remove skin from the breech and/or tail of a sheep then they would be in contravention of the regulation.

Should you wish to discuss our submission further, please do not hesitate to contact me on 0488 554 811 or via email (jhall@woolproducers.com.au).

Yours Sincerely,



Jo Hall
Chief Executive Officer

