



20L138

20 August 2020

**LIVESTOCK SA...**

Unit 5, 780 South Road, Glandore SA 5037

**P** 08 8297 2299 **F** 08 8293 8886

**E** admin@livestocksa.org.au

[livestocksa.org.au](http://livestocksa.org.au)

### **Proposed changes to the Animal Welfare Regulations 2020**

Livestock SA welcomes the opportunity to comment of the proposed amendments to the Animal Welfare Regulations 2012.

In general terms, the proposed amendments are supported.

Livestock SA in particular wishes to highlight the amendment dealing with electronic collars as in recent years these have been developed for use as “virtual fencing” for livestock.

The amendments and Livestock SA’s responses:

- *Exempt rodeos affiliated with the Australian Professional Rodeo Association from the requirement to hold a permit*

**Support.** Livestock SA supports Australian Professional Rodeo Association and their affiliated rodeos as an important community activity for regional South Australia.

- *Clarify the provisions relating to electronic collars and allowing their use on livestock*

#### **Support**

- Livestock SA supports the amendment, however, would like the amendment to be “exclude livestock from the prohibition on the use of electronic confinement **devices.**”
- The virtual fencing technology exists for livestock electronic confinement tags as well as collars, and therefore Livestock SA proposes this is recognised in the legislation by referring to devices rather than collars.
- One of the areas of substantial expense to farmers are the erection and maintenance of fences. Livestock SA supports the investigation of innovative technologies such as virtual fencing that may enable cost savings to be achieved as well as deliver better environmental, animal welfare and social outcomes.
- As an industry, South Australia supports Agtech and “virtual fencing” is one aspect of this, therefore Livestock SA does not wish to see the advancement of this technology hindered.
- Sensitive areas can be protected by virtual ring fencing to a greater extent than can be done with conventional fencing.
- Stock management and oversight is more comprehensively assisting the state commitments to outcomes such as National Livestock Identification Scheme.
- In extensive grazing systems, the cost of fencing is substantially reduced.

- Virtual Fencing can enable the following Animal Welfare benefits:
  - Early disease detection as a lack of movement in the device attached to animal can alert operator
  - Avoid stock loss in flood or bushfire event as virtual fences can be turned off if there is sufficient warning of flood or fire event, and the neckband does not physically prevent cattle from seeking safety.
  - the virtual fencing technology is species specific so that native animals can move through the landscape unhindered.
  - When trained through the audio cues, the livestock learn they can avoid the mild shock if they want to through free will.
  
- Recently, a commercial trial was undertaken in South Australia by the CSIRO and Barossa Improved Grazing Group, to assess whether virtual fencing technology could exclude 20 cattle from an environmentally sensitive area of regenerating saplings, across 44 days using a contoured virtual fence line. The results demonstrated:
  - that the cattle were able to rapidly learn the virtual fencing cues, responding primarily to audio cue alone 74.5% of the time, with an electrical pulse administered if the animal continues moving forward following the audio cue.
  - the cattle were excluded from the regenerating area for 99.8% of the trial period, which delivered various NRM outcomes for graziers included reduced overgrazing and erosion, and improved maintenance of ground cover and weed control.
  - at the conclusion of the trial, the feed available in the protected zone was double the quantity and quality of the grazed zone thus showing that the prototype protected an environmental asset within the paddock from cattle grazing.
  - Details on Commercial Trial: “Virtual Fencing Technology Excludes Beef Cattle from An Environmentally Sensitive Area” <https://biggroup.org.au/project/virtual-fencing/>
  
- Virtual Fencing uses a lower level of shock than that of a conventional electric fence.
  
- Studies have been undertaken to compare conventional electric fencing with that of virtual fencing to measure the different to animal welfare and behaviour. The results demonstrated:
  - There were not any significant differences between fence types, which indicated that virtual fencing technology contains animals in a prescribed area across 4 weeks without substantial behavioural and welfare impacts on the cattle.
  - Trial information to be found, *Virtual fencing is comparable to electric tap fencing for cattle behaviour and welfare*, researched by Agriculture and Food, Commonwealth Scientific and Industrial Research Organisation (CSIRO), Armidale, NSW, Australia.
  
- *Make the prescribed kennel and cattery sizes advisory rather than mandatory*

**Support.** Livestock SA supports this amendment, as there may be unintended effects to the interest of kennel sizing for working dogs.

- *Remove the requirement for a licence and Ministerial approval of training regimes for the purchase and use of electro immobilisers*

**Support.**

- Whilst the use of Electro-immobilisers is not widely used in the industry, we support access to the technology as a solution to providing necessary treatments in the instance that an animal cannot be suitably restrained.

- It has been identified that there is an increasing shortage of shearers in Australia. Therefore, alternative strategies are being considered with one being advances in automatic shearing. Through this technology, one option for restraining the sheep is the use of the electro-immobiliser.
- Allow the use of dog traps without the requirement to apply a lethal toxin to the jaws of the trap if the trap is checked at least every 24 hours and any animal caught in the trap is released, treated or humanely destroyed

#### **Support.**

- Wild dogs are a threat to the South Australian livestock industries, which is why Livestock SA has supported government and industry initiatives to manage wild dogs. For instance, the investment into re fencing the SA Dog fence. As such Livestock SA also promotes best practice management techniques that aid land managers in their ability to control the population of wild dogs on their land holdings.
- Livestock SA supports this amendment, as it is our understanding most land managers will use this option and choose to check their traps daily. This ensures they minimise the suffering of wild dogs that are trapped by destroying them in a timely manner, as well as reducing the risk of damage to their livestock or any native animals.
- Livestock SA promotes the use of the rubber jawed leg hold trap as one tool for land managers in the control of wild dogs, however, understands that the legislation for the use of lethal toxin makes the tool prohibitive for “organic” land managers. The Lethal Toxin strychnine is a prohibited substance under the US National Organic program, therefore giving organic producers the opportunity to access this tool to aid in the management of wild dogs without damaging their Organic status will support greater wild dog control.
- There are Occupational Health and Safety concerns with handling S7 restricted substances “lethal toxins”, this amendment reduces the risk to those landholders and their staff who check their traps daily.
- Allow dog traps to be used outside the municipal council areas, including north of the dog fence

#### **Support**

- Livestock SA’s policy position on Wild Dogs includes:
  - “Producers outside the fence must be given access to the same wild dog control measures to those inside the fence”
- Livestock SA supports the use of the rubber-jawed leg-hold trap outside (north) of the dog fence, as it is considered best practice when a part of an integrated approach to reducing the impacts of wild dogs on Livestock profitability.
- This measure gives land managers north of the dog fence another tool to adequately manage their wild dog population, thereby reduces some of the pressure on the dog fence from northern dogs.
- The tool is considered one option and is often used to control destructive problem dogs that are cunning and evade other measures.

- Whilst wild dogs are best known for killing sheep, there are many instances where cattle, particularly calves have been killed by wild dogs. Cattle are the livestock species of choice north of the dog fence.
- In Livestock SA's opinion, the measures in place will never achieve eradication of the wild dog population. Eradication is also not the desired outcome of the Pastoralists; it is just an additional strategy to support best practice management to control the wild dog population.
- Provide that if camels are transported by truck, the truck must be roofed or the sides of the truck higher than the height of the camel with head and neck extended

**Support.** Livestock SA supports the amendment for the transport of Camels.

- Deregulate the Model Codes of Practice

**Neither support nor oppose.** In principle Livestock SA provides support, however, Livestock SA requires more details based on the specific details of the model codes that will be amended. Livestock SA would like to understand what will be regulated as mandatory provisions that are not already addressed by the regulation before full support will be granted.

- Simplify the "prescribed species" in the Regulations to reflect these changes

**Support.** Livestock SA supports this amendment and would like to be involved in the investigations

- Clarify the status of spells in the livestock transport regulations

**Support.** Livestock SA supports this amendment.

- Remake the regulations

**Support.** Livestock SA supports the remaking of the regulations.