

26 October 2023

Executive Director, Risk Assessment Capability
Australian Pesticides and Veterinary Medicines Authority (APVMA)
GPO Box 3262
Sydney NSW 2001
Via email: enquiries@apvma.gov.au

To whom it may concern,

RE: Trade Advice Notice on lignocaine and bupivacaine in the product Tri-Solfen Wound Anaesthetic & Antiseptic Solution for use on sheep. APVMA product number 88635. September 2023

WoolProducers Australia (WoolProducers) is the peak industry body representing Australian wool growers across a vast range of issues from animal health and welfare, biosecurity, natural resource management, emergency animal disease outbreak preparedness, and industry development -including research and trade.

Consumer perceptions and expectations with regards to animal welfare is a rapidly evolving topic, of which WoolProducers is actively involved. In response to these evolving consumer expectations and industry standards, there have been several innovations in the pain relief field to ensure growers have access to registered, cost effective and practical pain relief products (both analgesics and anaesthetics) that can be applied when undertaking painful animal husbandry procedures such as mulesing, castration and tail docking.

The usage of such pain relief products in these situations is now considered by many downstream consumers of both meat and wool as “best practice”, which is reflected by the voluntary use of pain relief products when undertaking painful animal husbandry procedures practices. Having said this, there are a number of barriers associated with pain relief products, which may inhibit their use by producers, including negative perceptions associated with extensive withholding periods (WHP).

WoolProducers appreciate and respect Australia’s regulatory frameworks and industry systems and the contribution that they make towards both establishing and maintaining Australia’s favourable market access for exported agricultural commodities. In removing barriers to adoption, it is essential that this favourable market access is not compromised. The primary source of trade risk would likely result from confusion between WHP and ESI, however this would be no different to other products where there is a difference between WHP and ESI.

Below are industry systems and practices that assist in mitigating adverse risks as a result of amendment of the WHP from 90 days to zero while maintaining the current Export Slaughter Interval (ESI) of 90 days.

National Vendor Declaration:

The Livestock Production Assurance National Vendor Declaration (NVD)¹ communicates the food safety and treatment status of every animal, every time it moves between properties, to saleyards or processor. The NVD is a legal document, and while voluntary, it is almost universally required by all meat processors, particularly those supplying export markets. As part of the NDV growers are required to declare any sheep or lambs that are sold that are still within a WHP or ESI as set by APVMA or SAFEMEAT, following treatment with any veterinary drug or chemical. The NVD and supporting explanatory materials explaining terms such as WHP and ESI assist in mitigating residue and food safety risks that may impact trade.

Practicality and timing of use:

Many producers undertake castration and tail docking using elastic rings, procedures for which Tri-solfen is not suitable for use due to the absence of an open wound. The 2022 Sheep Sustainability On-Farm Insights report² found that 98% of producers castrate using rings. The same report found that 36% of Merino producers and 72% of non-Merino

¹ [National Vendor Declaration | Integrity Systems](#)

² [ssf-on-farm-insights-report-web-25oct2022.pdf \(sheepsustainabilityframework.com.au\)](#)

producers undertook tail docking using rings. Due to the costs associated with lamb marking and the age at which tail docking and castration are typically undertaken, it is highly unlikely that lambs that have had Tri-solfen applied would be of a sufficient weight / age to enter export markets within the 90 day ESI.

With the prevalence of rings for tail docking and castration, the primary use of Tri-solfen will therefore be for lambs that require mulesing. Mulesing is undertaken to enhance long-term welfare of sheep³ via the removal of excess wool-bearing skin from the breech area of lambs using mulesing shears. Undertaking mulesing reduces the risk of breech flystrike in susceptible animals. Given the cost and long-term welfare objective associated with undertaking mulesing it is highly unlikely that such animals would enter and food supply chain (especially export) within 90 days of treatment.

Given the well-established industry systems and on-farm practices and practicalities that assist in mitigating trade risk associated with the proposed amendment, WoolProducers are supportive of the amendment of the WHP from 90 days to zero while maintaining the current Export Slaughter Interval (ESI) of 90 days.

Please do not hesitate to contact me on 0455 442 776 should you wish to discuss any issue raised in this letter.

Yours Sincerely,



Adam Dawes
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³ [Sheep-Standards-and-Guidelines-for-Endorsed-Jan-2016-061017.pdf \(animalwelfarestandards.net.au\)](#) – 7. Mulesing