

**Submission to the European  
Commission on the Inception Impact  
Assessment relating to the Revision of  
the EU legislation on animal welfare**

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20 January, 2022

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## **Inception Impact Assessment relating to the Revision of the EU legislation on animal welfare**

Dear [REDACTED],

WoolProducers Australia (WoolProducers) is the peak industry body representing Australian wool growers across a vast range of issues, including animal health and welfare, biosecurity and trade. WoolProducers welcomes the opportunity to provide a submission to the proposals offered in the "Inception Impact Assessment" relating to the Revision of the EU legislation on animal welfare.

WoolProducers supports the need to ensure that animal welfare regulation continues to deliver positive lifetime animal welfare outcomes that are supported by science, while meeting evolving societal expectations. We applaud the revision of EU legislation on animal welfare, however we have concerns in relation to such regulations being universally applied to goods originating from outside of the EU. While it may be possible to harmonise regulations for a finite stakeholder group (i.e. EU member states), it becomes increasingly impractical to develop harmonised regulations as the number and diversity of stakeholders increases, while continuing to achieve desired animal welfare outcomes. Contemporary animal welfare regulation should focus on achieving enhanced animal welfare outcomes that are supported by science and appropriate for the respective production systems, environmental and climatic conditions.

WoolProducers actively pursue enhancements to Australian animal welfare regulations, including its membership of both the Writing and Reference Group of the [Australian Animal Welfare Standards and Guidelines for Sheep](#). (Standards and Guidelines). Further to this WoolProducers has developed an Animal Welfare Statement acknowledging the Five Domains of Animal Welfare Model, in line with the aspirations of the European Commission, a copy of the statement is appended to this letter for your reference.

The Standards and Guidelines were developed to facilitate nationally consistent policies to improve animal welfare arrangements in all Australian states and territories (in a manner not dissimilar to the harmonisation that this review is seeking to achieve across EU member states). Sheep (and wool) production takes place over a vast range of climatic regions in Australia, ranging from Temperate to Desert environments. Each unique climatic region brings differing animal husbandry requirements in order to optimise lifetime animal welfare. The Standards and Guidelines provides= a framework that facilitates national harmonisation, while allowing state and territories to establish specific requirements on the basis of the industries(s) within their jurisdiction in order to achieve the desired outcomes.

The **Standards** provide a basis for developing, implementing and enforcing consistent legislation across Australia, and provide guidance for all people responsible for sheep. The **Guidelines** are not regulated, however seek to compliment the standards and should be considered by industry for incorporation into business activities and quality assurance standards.

WoolProducers is concerned with the proposal of the Inception Impact Assessment that husbandry procedures (referred to as mutilations), such as tail docking and castration may be prohibited (Option 1). This proposal infers that such procedures are detrimental to animal welfare. On the contrary the Standards and Guidelines states that:

*“Tail docking and castration are done only when necessary, and in a manner that minimises the risk to the welfare of sheep, particularly pain and distress..... and the procedure results in:*

- *benefits to life-time sheep welfare*
- *better flock management*
- *a reduced work (occupational) health and safety risk.”*

Further to this the Standards and Guidelines states that *“Tail docking and castration should be accompanied by pain relief when practical and cost-effective methods become available<sup>1</sup>”*. This point supports the enhancement of the lifetime animal welfare outcomes via best practice animal husbandry, acknowledging the fact that when developed in 2016 pain relief products were in the process of commercialisation, but not yet readily available or cost effective. Since 2016 Australian grower funded Research and Development organisations (Australian Wool Innovation and Meat and Livestock Australia), along with University and Government research organisations have invested significantly in the development of pain relief systems, resulting in increasing voluntary uptake of these products.

In addition to the Standards and Guidelines the Australian wool and lamb industry has recently developed and implemented a national [Sheep Sustainability Framework](#). The Framework documents our commitment to enhancing the sustainability of our industry in and informs industry policy through a series of metrics built upon four key themes, the first of which is animal welfare. The themes of the Framework reflect both the desires of Australian producers and the expectations of our customers alike.

The imposition of regulatory requirements, such as the prohibition of husbandry procedures such as tail docking and castration of sheep may result in compromised lifetime welfare outcomes depending on production systems, environmental and climatic conditions. The imposition of “compliance labelling” could mislead consumers on the animal welfare status of goods, should regulatory requirements fail to be fit for all purposes.

WoolProducers Australia supports the initiative of the European Commission to review animal welfare regulations to ensure that positive lifetime animal welfare outcomes are achieved, while meeting evolving societal expectations. We encourage the European Commission to acknowledge the differing animal husbandry requirements across the globe and to implement trade settings which allow countries supplying the EU to use best animal husbandry practice suited to their unique climatic conditions and pest and disease status. The European Union can be assured that animal products imported from Australia are produced in accordance with best practice that is supported by industry and regulatory authorities alike.

WoolProducers thanks you for the opportunity to make this submission and would encourage you to contact WoolProducers’ General Manager, Mr Adam Dawes on +61 455 442 776 or [adawes@woolproducers.com.au](mailto:adawes@woolproducers.com.au) should you wish to discuss our submission further.

Yours Sincerely,



Ed Storey  
President

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<sup>1</sup> [Australian Animal Welfare Standards and Guidelines for Sheep](#) (2016) G6.14

## **Attachment A**

### **WoolProducers Australia Animal Welfare Statement (November 2018)**

#### **Introduction**

Animal welfare is a key priority for WoolProducers Australia, and as the peak national body for the wool industry in Australia, we believe that the industry will benefit from a united approach to animal welfare. Individuals involved in the wool industry and its supply chains must take a proactive approach to ensure that a positive welfare state is achieved for each animal in their care. WoolProducers encourages industry stakeholders to adopt this statement as their own.

#### **Our position**

Welfare is a broad term that is not easily defined, but it is a state that exists within every animal and therefore must incorporate the physical and mental well-being of the animal. An animal is in a positive state of welfare when it is healthy, comfortable, well nourished, safe and able to express natural behaviours, indicated by science-based evidence. Good husbandry and veterinary practices and sufficient availability of resources enable a positive welfare status to be achieved.

All husbandry activities should be conducted to the highest possible welfare standards, and only be conducted when the lifelong benefit to the animal outweighs any short-term adverse welfare impacts.

It is the responsibility of every person involved in Australia's wool industry to achieve a high standard of animal welfare so that each animal in their care lives in a positive welfare state. As such, WoolProducers adopts the Five Domains of Animal Welfare Model. The Model provides a foundation to guide welfare management objectives that achieve a positive welfare state for each individual animal. We support unbiased scientific, evidence-based approaches to determine clearly defined and measurable welfare states.

#### **Our commitment**

WoolProducers demonstrates our ongoing commitment to the positive welfare states of animals in the wool industry through our policy and advocacy efforts. This is evidenced by WoolProducers' commitment to:

- Supporting the Australian *Animal Welfare Standards and Guidelines for Sheep*;
- Supporting the development of a sheep husbandry best practice guide;
- Endorsing voluntary self-regulatory animal welfare programmes to progress best practice management;
- Supporting required standards of animal management necessary to maintain necessary animal health needs;
- Seeking to achieve sustainable animal welfare improvements by pursuing scientific measurement of minimum standards, at the herd or flock level;
- Achieving animal welfare decision making mechanisms that reflect the credibility of participants;
- Ensuring coordinated animal welfare research efforts;
- Supporting investment in finding an alternative to mulesing and phasing out the practice when a universally accepted alternative is available;
- Promoting the use of pain relief; and,
- Endorsing the IWTO International Wool Specifications.

#### **Implementation**

WoolProducers' Executive and Animal Health and Welfare Committee endorse this Welfare

Statement. Responsibility to meet the expectations of this statement lie with all who are in

