



1 June 2008

Professor Roy Green
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Submitted via email - TCFReview@innovation.gov.au

Dear Professor Green,

**Animals Australia's submission to the
Review of Australia's Textile Clothing and Footwear (TCF) Industry.**

Thank you for accepting this submission, and apologies that I was not aware of the inquiry into the TCF industry until last week, and thus we are providing a belated response.

Our concerns relate to the welfare of the animals involved in the production of textiles, primarily wool, and how that concern then relates to Australia's international image and of course the future of consumer acceptance of the fibre and it's products.

Our submission therefore relates most closely to the following aspects of the Review's Terms of Reference:

3. *The review will consult broadly among industry stakeholders and interested parties to examine and make recommendations in relation to:*

a. the changing nature of the industries in the TCF sector and their current performance and prospects;

.....

4. *In examining these matters and making recommendations, the review will consider the broader economic environment and all issues affecting the sector, including:*

a. the Australian TCF industries' competitive strengths and weaknesses;

.....

d. the international trading environment, and opportunities for access to global markets and supply chains;

Animals Australia is a peak animal protection body formed in 1980 and now with some 40 member animal welfare societies and thousands of individual members. Our interests are therefore broad, and we operate by representing the animal 'interest' on government and other committees, most notably the federal Agriculture Ministers' 'National Consultative Committee on Animal Welfare', and similar State-based animal welfare advisory committees.

In recent years our focus has been on raising public awareness of welfare problems inherent to our farm animal industries which numerically are the largest 'users' of animals. Of particular concern are the methods of confinement in 'intensive' systems (such as battery caging of egg-laying hens, breeding pigs, meat chickens etc) and with some of the husbandry methods used, particularly the surgical procedures including castration, tail docking, teeth clipping, debeaking, dehorning, and mulesing – all without any pain relief.

It is those methods used on wool bearing sheep in Australia that are of greatest relevance to your review. I will provide some information on two primary issues of concern – the mulesing of sheep and the penning of sheep indoors for 'ultra fine' wool.

Mulesing

This issue has received an enormous amount of media coverage of recent times due to an international wholesaler and retailer concern (in Europe and beyond) about a consumer backlash due to concern about the mulesing mutilation of lambs. We submit that this is a major threat to the future prospects of the wool industry.

It is fully acknowledged that flystrike is a major problem for sheep in the Australian wool industry. When a strike occurs, blowfly eggs laid on the skin of the sheep hatch into larvae, which feed on the sheep's tissue. Flystrike can produce inflammation, general systemic toxemia, and even death. It is estimated that around 3 million sheep a year die as a result of flystrike in Australia (Wardhaugh and Morton, 1990). Many more are affected by non-fatal strikes.

Very careful husbandry can protect sheep from flystrike without mulesing 'surgery' (i.e. regular surveillance, crutching, insecticides etc). Unfortunately, given the large numbers of sheep run over extensive areas in Australia, and with very low labour levels, sheep do not typically receive this sort of care and attention.

What is Mulesing? In an attempt to reduce the incidence of flystrike in Australia, the 'Mules' operation was introduced in the 1930s; the skin is sliced from the buttocks of lambs without anaesthetic to produce a scar free of wool, faecal/urine stains, and skin wrinkles. Over 20 million merino breed lambs are currently mulesed each year. Most will have their tail cut off and the males will be castrated ('marked') at the same time.

Mulesing involves cutting a crescent-shaped slice of skin from each side of the buttock area; the usual cut on each side is 5 - 7cm in width and extends slightly less than half way from the anus to the hock of the back leg in length. Skin is also stripped from the sides and the end of the tail stump. This surgical procedure is usually done without any anaesthetic¹. [There is some debate about the effectiveness of the only registered (topical) pain relief spray now used by some farmers/contractors – with the first scientific study showing effectiveness only if used in conjunction with an injected NSAID which is currently not registered for use on sheep in Australia.]

Mulesing does reduce (but does not eliminate) the incidence of breech strike, that is, flystrike around the buttocks. Mulesing has no effect on the incidence of flystrike on parts of the body other than the buttocks.

There is also no doubt that mulesing is extremely painful. In addition to the scientific measurement of highly elevated cortisol levels in mulesed lambs, researchers have also measured behavioural indicators. When mulesed sheep were first released into a paddock they grazed and moved freely at first, suggesting some temporary pain relief from the endorphins. Soon, however, they showed abnormal behaviour which persisted to some degree for 72 hours and was described by Fell and

Shutt (1989, p.287ⁱⁱ) as follows: *“Characteristically they stood with head down, nose almost touching the ground, back arched and body hunched and, maintaining this posture, they made sudden brief runs with a short, mincing gait quite unlike the steady walking of the controls.”*

The mulesed lambs also showed strong avoidance of the person who mulesed them for 37 days. The work done by these researchers shows that lambs are in pain for at least 3 days following mulesing. The large scars left after mulesing take several weeks to heal and are susceptible to infection and flystrike.

Current Situation - In 2004 the Australian wool industry, concerned by the threat to their international wool markets due to revelations about the prevalence of this mutilation to lambs, and newly challenged by international animal rights group People for the Ethical Treatments of Animals (PETA, a USA-based group), set itself a deadline of 2010 to phase out the practice. Australian-based groups, including Animals Australia and its member societies, and veterinarians had for many years urged action on this issue – sadly without significant effect.

Since 2004 industry and government funding has been significantly increased to find alternate methods to reduce flystrike incidence (other than via mulesing). Several methods are being trialled including the application of clips which stretch the skin and ultimately atrophy and thus remove the excess wrinkled skin, chemical compounds injected beneath the skin of the buttocks to have the excess wrinkles slough off, and projects to select and breed sheep with bare (wool-less) breach areas. It should be noted that the ‘clips’ have been dubbed ‘clip mulesing’ by animal advocates, and some European retailers have already indicated they will not purchase wool from properties using this newly developed method either.

In the interim (until 2010) a new ‘appendix’ to the Code of Practice for the Welfare of Animals – the Sheep, was introduced in 2006. It provides further guidance on the best mulesing method, but is a voluntary code. Because mulesing is described in this code and is thus considered an ‘acceptable husbandry’ practice, it is therefore exempt from the cruelty provisions of animal welfare laws.

Mulesing contractors – who go onto farms to mules (tail dock and castrate) lambs – are now required to be ‘accredited’ and new training courses have been introduced in the last two years. Farmers who mules their own lambs need not be trained and accredited until the end of 2008.

Recent developments - In March 2008 the NSW Farmers Association called for an immediate ban on mulesing in order to stave off threatened boycotts of Australian wool by up to 60 foreign (mostly European) retailers following further negative publicity in Sweden and other Scandinavian countries. On the same day the Western Australian Department of Agriculture announced that it would end mulesing of lambs on its research stations forthwith.

More recently still there has been an announcement that the Australian Wool Exchange (which conducts the wool auctions) will from July 2008 require all wool bales to be accompanied by a declaration as to whether the sheep have been mulesed or not, the farmers future intentions, and farmers can also indicate if pain relief was used (if the sheep were mulesed).

Clearly this is likely to be the first of many similar international trade issues with wool now that the buyers have been alerted to Australian practices. For example, with sheep, the tail docking and castration (male) of lambs without any pain relief is likely to become an issue.

Further information on mulesing can be obtained from <http://www.animalsaustralia.org/issues/mulesing.php>

Live Animal Export - sheep

You will be aware that wool farmers have the option of sending their sheep to local abattoirs or to the live export trade. Just under 4 million Australian sheep left Australia last year and were sent by ship to Middle East countries. This trade in live animals is opposed by every international animal protection organization and this trade carries has the.

Over the past three decades Australian has exported over 150 million sheep to the Middle East. During that time some 2.5 million have died on board vessels - the majority from failing to eat the pellet food (the only food provided) and often related salmonellosis infection. Last year over 35,000 sheep died enroute – however, the tragic reality is that those animals that die before reaching their destination may well be the fortunate ones..

Since 2003 Animals Australia has conducted five investigations in the Middle East in Kuwait, Jordan, UAE, Bahrain, Oman, Egypt and Qatar – countries where there are no laws to protect animals from acts of cruelty – and where brutal treatment is endemic. Our investigations led the Australian government to suspend the live trade to Egypt after we documented and provided evidence of barbaric slaughterhouse practices that our live export industry had denied were still occurring.

Despite evidence of brutal and extensive mistreatment of Australian Merino sheep in other Middle East countries the Australian government is still approving export permits and farmers continue to send their animals for export.

You may be aware that the OIE (the World Organisation for Animal Health) was established to encourage improved animal welfare standards and that as a result guidelines for the handling, transport and slaughter of animals were developed. These Guidelines are **very basic** standards of animal treatment—lower than the requirements of developed nations such as Australia, but designed to prompt significant improvement in those countries with no animal welfare laws.

As these Guidelines are not internationally enforceable, the only way that the OIE can be effective in improving animal welfare internationally is if compliance with guidelines forms the basis for bilateral trade agreements. See the following advice from the OIE Secretariat in 2006:
The OIE 'strongly encourages all Member Countries to implement [the Guidelines] through national legislation, as a basis for bilateral agreements between countries, and for producers or industries which require them to demonstrate that they meet approved animal standards animal welfare.'

Extensive evidence of non-compliance with OIE guidelines involving Australian sheep has been documented in the Middle East and provided to the Australian government. Despite this, Australia continues to supply animals to this region, and through doing so is undermining the work of the OIE to encourage improved standards in these countries.

Australian rural representatives and the Federal government have defended the trade by stating that they are attempting to improve welfare in the Middle East. You cannot genuinely oppose animal cruelty whilst you are also supplying millions of animals to be cruelly treated – and no amount of training courses of feedlot staff can overcome the widespread belief created by the supply of millions of Australian animals that cruel treatment is acceptable.

The expression that as a nation we were 'built on the sheeps' back' is not one to be proud of for those Australians aware of and concerned for the welfare of sheep. In the same way that the cruelty of mulesing was kept from international buyers of Australian wool for decades, so has the fact that for over 30 years millions of these same sheep have then been subjected to the suffering and cruelty of the live export trade in the last weeks of their lives. The Australian wool industry's

animal welfare reputation, already dented by the mulesing issue, will no doubt continue to be undermined by the growing public and consumer knowledge (both in Australian and overseas) of the welfare problems of live animal exports to the Middle East.

You can view further information, including sheep handling in the Middle East at www.LiveExport-Indefensible.com

Ultrafine wool production – shedding of sheep

In Victoria and New South Wales over the last ten years or so, there has been an increase in the number of farmers opting to keep their fine-wooled sheep indoors, in shed and on restricted diets, to strive for even finer wool for the high end of the fashion market – mostly for export to China (for processing) and Europe.

The 'ultra-fine wool' business is an intensive animal industry. In fact, one particular facility is even appropriately called '*The Wool Factory*'. Specially bred or selected Merino sheep are kept indoors in individual small pens 24 hours a day for 4 or five years. Nylon coats are worn by the 'shedded' sheep to further ensure that dust and dirt does not enter their fleece, and—like every other intensive animal industry—the behavioural and social needs of the sheep, intrinsic factors which provide quality of life, are completely ignored. Some indoor 'ultra fine' facilities house the sheep in groups. A full welfare assessment of this intensive system is yet to be undertaken, and particularly because leaders of that industry have until recently refused to allow it to occur.

A major supporter of Australia's ultra-fine wool industry is leading Italian fashion house, Ermenegildo Zegna. The 'prestige' of winning an Ermenegildo Zegna award is much sought after in wool industry circles. The '*Vellus Aureum Trophy*' is awarded by Count Paulo Zegna each year for the '*golden fleece*'—the finest micron fleece. It is feared this industry is growing, and that, as with the other issues raised above (mulesing, other surgical procedures undertaken without pain relief, and live sheep exports) this segment of the wool industry will jeopardise Australian animal welfare record internationally.

Animals Australia has looked at the scientific work (limited as it is) which raises grave concerns about the behavioural/psychological and physical health of the shedded sheep – particularly those in individual pens. You can view some footage of the behavior of sheep at The Wool Factory at http://www.animalsaustralia.org/issues/ultra_fine_wool.php

Individual penning of animals - Individual penning denies sheep social interaction which is recognized as a required natural behaviour.

Gregariousness is the most outstanding characteristic of sheep. A sheep needs to be with other sheep in order to be in a state of well-being and normative physiology. Sheep will always try to maintain uninterrupted visual contact with a least one other sheep and will flock close together at any sign of danger. Individuals show a multitude of endocrine, hematological and biochemical alterationsⁱⁱⁱ and a marked increase in heart rate and respiration rate when separated from other sheep.^{iv}

Even more than cattle – who, unlike sheep can easily overcome their fear of people – sheep require social company in order to cope with the circumstances of their domestication. It therefore follows that, in accommodating these animals that their social needs must be given full consideration, on a par with other well-recognized physical needs such as nutrition hygiene, and shelter.^v [Reviewers emphasis]

Inability to perform natural behaviours - A further primary concern regarding individual penning of sheep is their inability to exercise and graze. It is recognized that the well-being of animals in a captive environment is directly related to their ability to continue to perform behaviours innate to that species. Correspondingly, that the denial of this opportunity causes suffering.

Whilst the average community member could accurately state that sheep spend the vast majority of their time grazing in a flock situation which provides important security and social structure - it has also been documented by research scientists.

When given the opportunity sheep will spend approximately 8 hours per day grazing^{vi} and travel several kilometers.^{vii}

Although casual observation of well-habituated sheep in small stalls may not reveal any outward signs of distress, the confined subjects will show a distinct endocrine stress response reflected in increased adrenal activity.^{viii}

Individually housed sheep are restless and show an increased heart rate that may persist over many days and account for an increased metabolic rate of up to 15%.^{ix}

A lone sheep will never be at ease and hence will always be unsuited for research that relies on stress-free data. Not only for scientific but also for ethical reasons, a sheep should not be housed alone unless there is evidence that social housing would jeopardize the animal's health and/or well-being.^x

Experts in animal behaviour have identified two primary behavioural signs of chronic stress in sheep.

1) Stereotypies

Stereotypic, or repetitive, functionless behaviours are seen less frequently in ruminants, and in sheep in particular than in other species.^{xi} This may be because sheep are less frequently kept in the type of housing that causes stress and elicit stereotypies. Individually housed sheep have, however, been shown to demonstrate stereotypical oral behaviours, such as mouthing bars, chewing slats and biting and chewing pen fixtures.^{xii}

Locomotor stereotypies have also been reported, including rearing against the pen, repetitive butting, star-gazing (arching the head and neck over the back, weaving and route-tracing.^{xiii}

Feed restriction increases the frequency of abnormal oral behaviours^{xiv} Providing hay or increased fibre in the diet reduces oral stereotypy^{xv} and increased lying and rumination.^{xvi}

2) Conservation – withdrawal response

The conservation-withdrawal response is associated with immobility, decreased response to environmental stimuli and increased adrenal corticoid activity^{xvii}. An animal faced with a situation in which it perceives no way to cope, or in which its efforts to cope do not succeed, is likely to adopt the conservation withdrawal pattern.^{xviii} (Moberg 1985).

It is highly likely that an expert in animal behaviour would document both stereotypic behaviours (chewing of pen fixtures, wooden slats and wire, and repetitive body movements) and withdrawal responses in the sheep that are singularly penned at 'The Wool Factory'.

The 'Five Freedoms' internationally recognised as necessary principals to ensure adequate animal welfare. Animals Australia concludes that the indoor enslosures and single penning of sheep for ultra fine wool production is failing to provide the animals with the following three of the 'Five Freedoms' required and has ignored the mental suffering caused by this method of housing.

2. Freedom from Discomfort - by providing an appropriate environment including shelter and a comfortable resting area.

Whilst the animals have shelter, they do not have an environment appropriate to the behavioural needs of their species – nor are they provided with a comfortable resting area.

4. Freedom to Express Normal Behaviour - by providing sufficient space, proper facilities and company of the animal's own kind.

As outlined above, the sheep are not able to graze, to adequately exercise, nor to flock.

5. Freedom from Fear and Distress - by ensuring conditions and treatment which avoid mental suffering.

As discussed above, through a lack of the ability to perform natural behaviours (including seeking the security of a flock), fear and distress will occur.

Again – this type of confinement of sheep is of concern and may lead to a risk to Australian wool markets in the short to medium term as knowledge of the method grows.

In conclusion:

Animals Australia submits that the welfare of sheep in the wool industry – as outlines above – is severely compromised by traditional practices such as mulesing and mutilations performed without pain relief, by live animal export to the Middle East, and now also by the increasing practices such as the housing and husbandry methods used to growing of ultra fine wool in sheds. Such welfare insults risk the future acceptability of wool from Australia.

I would be pleased to expand upon these issues, or clarify issues if required.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Glenys Oogjes', is centered on the page.

Glenys Oogjes
Executive Director

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- ⁱ Recently a topical analgesic spray 'Trisolfen' has been released under an APVMA trial, but its use in voluntary and not widespread.
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