

Comments on the NSW Animal Welfare Reform Discussion Paper, with special reference to goats

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6 New Offences	Agreed But do not add in goat racing	Goat racing is sometimes criticized but as long as the goats are trained first, this is a good activity for children and young people. This billy goat cart racing is also part of Australia's culture. Goat racing should be allowed.
7 Clarify prohibited and restricted procedures	Strongly support ensuring normal husbandry procedures stay as allowed e.g. not just ear tagging but also disbudding, tattooing, castration, horn trimming	
8 Providing certainty for lawful activities	The defence is too vague e.g. what constitutes unnecessary harm to the animal. Pest animals need to be controlled to protect native animals and livestock and some could argue if they are killed it is unnecessary harm).	Foxes, dingos and wild dogs kill many goats and kids and need to be controlled. This means shooting or poisoning.
14 Improve oversight of animal welfare enforcement activities	Strongly support oversight of RSPCA and other organisations to the same levels as DPI staff	
Category 3 offences Fail to take reasonable steps to meet minimum care requirement	This includes: "providing for the treatment of disease or injury (including timely provision of veterinary treatment where needed)." However	Dairy goats often suffer from worms yet the only worm drench registered for use in milking goats is Panacur, which has a lot of resistance. Other laws need to change to allow veterinarians to prescribe worm drenches for milking goats despite them having on their label Do Not Use in animals whose milk is used for human consumption. Manufacturers add this to labels so

	for minor species this is very difficult.	they do not have to do & pay for milk residue research prior to registration. Vets can access overseas data on milk with-holding periods for goats e.g. from the USA but current laws do not allow them to use this information to write a prescription due to the Do Not Use statement.
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ITEMS NOT COVERED IN THE DISCUSSION PAPER

- **Creation of breeds with defects**

Fainting goat genes have been imported in Australia but only currently used in meat crosses. We should not follow the US examples where the fainting gene is actively selected for and animals registered as this breed by sending in a photo of the goat down on its side unable to move.

- **Disbudding**

Unlike the situation with sheep and cattle, it is not possible to establish a poll goat breed as there is a linked gene to the poll gene for intersex and all pure poll female kids are sterile and can show external sexual characteristics that range from a normal female to a normal male or anything in-between. Most often they look like a female with an enlarged clitoris. Poll goats should not be kept with horned goats due to bullying and the damage that can be given to the poll goats.

Horned goats often get caught in fences as shown in the photo below and can die of thirst.



Also some goats have such large horns they are a WH&S issue for goat handlers. I lost a tooth when an Angora buck threw back its head while being examined. A child could lose an eye. Dairy goats have never been selected for horn type so horns can be massive as shown in the following photo.



Saanen buck who got his horns caught in a fence and bled profusely.

In the UK, disbudding is only done under anaesthesia by a vet. UK vets anecdotally report that in dairy goat herds where horns are left on, damage to goats requiring veterinary treatment, surgery or destruction happen approximately every 6 months. The British Goat

Veterinary Society produced a video on how to disbud for vets and proposes to run training courses for vets using dead kids.

In the USA anyone can disbud kids where vets feel that nerves to the horn bud area take longer to develop and as long as disbudding happens in the first week then this is acceptable. In the USA a recent survey found that 64% of dairy goat operations, disbudded their kids in the first 3 weeks of lifeⁱ which accounted for 67% of dairy goat breed kids. Meat goats and pet goats were also disbudded but at lower levelsⁱⁱ.

In Switzerland, goat farmers were given access to xylazine and ketamine (Schedule 8) drugs to anaesthetize kids prior to disbudding but a review found that farmers were not using these drugs properly and the kids disbudding was either not pain free or there were other problemsⁱⁱⁱ. I do not support giving anaesthetic drugs to farmers.

There has been a lot of research looking at alternatives to hot iron disbudding in goats and all have been unsuccessful including:

- Local blocks – as goat kids need 2 blocks per side or a ring block and this risks local anaesthetic toxicity (toxic dose is 1ml for a 2kg kid, the size of some miniature breed kids in the first week after birth). Also research has shown the blocks are more painful than the procedure.^{ivvivi}
- Prilocaine cream or EMLA cream as used in children for inserting catheters^{viii} and this cream may have even intensified the pain.^{ix}
- Clove oil injections.^x
- Liquid nitrogen^{xi}
- Caustic paste was only effective in just over half the kids.^{xii}

The latest review in 2021 summarized current knowledge and found “Collectively, we did not find that any of the alternative methods of disbudding provided a feasible option over heat cautery to improve welfare.”^{xiii}

While meloxicam has been shown to reduce the throbbing pain that occurs post disbudding, although it has no effect on the pain when the hot irons are applied^{xiv}. A survey of British Goat Veterinary Society members found that all vets used an NSAID, generally meloxicam, as well as an anaesthesia for disbudding. NSAIDs such as meloxicam was shown to help with post disbudding pain by several researchers^{xxvixvii}.

However there is no meloxicam product registered for use in goats. I use Buccalgesic gel every time I disbud a goat kid. My disbudding procedure is shown on this YouTube video <https://www.youtube.com/watch?v=6mT5tWD9qPE>. I recommend NSAID pain relief for disbudding provided it can be prescribed via telemedicine methods.

- **“Off Label” Prescriptions for Pain Relief products**

Neither TRI-SOLFEN nor any Meloxicam product is registered for goats and many goat owners report they have difficulty finding a veterinarian willing to treat or prescribe for their goats. Also many goats are kept in rangeland areas where veterinary services are a long distance away. For this reason I recommend that pain relief products be able to be prescribed via telemedicine to goat owners for routine husbandry procedures such as disbudding and castration. Covid 19 has shown that human prescriptions can be renewed via telemedicine, so there should be no barriers for veterinary pain relief prescriptions.

- **Access to veterinary medicines for goats**

Access to veterinary medicines is becoming more difficult for veterinarians willing to treat goats or other minor species such as alpacas. This is now a welfare issue. Currently there is only one active that is spray that can be used on dairy goats for lice but no powders nor backline treatments. Goats hate water so a spray is not ideal. Similarly there are only 2 worm drenches (Panacur and Caprimec/Virbamec) that can be used on dairy goats and one is a benzimidazole which has wide-spread resistance. I have clients with milking goats that have worms resistance to both drench families, yet I cannot legally prescribe a sheep drench from a different drench family due to the DO NOT USE statements on the sheep drench labels. Also antibiotics often have a DO NOT USE statement that prohibits use in goats. I recently had milk samples taken from a goat with mastitis and had great difficulty finding antibiotic to use that was needed based on the sensitivity results.

DO NOT USE statements should only be allowed to be placed on labels if there is a genuine danger e.g. monensin in horses or aspirin in cats, rather than just to save the manufacturers money so they don't have to do milk withdrawal period trials. Alternatively a veterinary prescription should be allowed to over-ride a DO NOT USE statement on a label. A good example is levamisole which used to be widely used in milking goats decades ago and for which the USA allows a 3 day milk with-holding period. However now there is no sheep levamisole drench that can be used in milking goats in Australia so one whole drench family cannot be used in combinations or rotations to prevent drench resistance in goats.

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ⁱⁱⁱ Wagmann, N., C. Spadavecchia, U. Morath-Huss, G. Schüpbach-Regula and P. Zanolari (2018). "Evaluation of anaesthesia and analgesia quality during disbudding of goat kids by certified Swiss farmers." BMC Veterinary Research **14**(1): 220-220.

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