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Organic Exports Program  
Department of Agriculture, Fisheries and Forestry

Submission via Haveyoursay website

5 November 2024

Dear Sir/Madam,

**Proposed changes to the livestock standards of the National Standard for  
Organic and Bio-dynamic Produce Edition 3.8**

Thank you for the opportunity to provide comment on the National Standard for Organic and Bio-dynamic Produce Edition 3.8: Proposed Changes to the Livestock Standards (“the Standard”).

Animal Medicines Australia (AMA) is the industry association representing the registrants and approval holders of veterinary medicines and animal health products in Australia. They are the local divisions of global innovators, manufacturers, formulators and registrants that supply essential veterinary medicines and animal health products that are critical to supporting Australia’s \$34 billion livestock industry and the \$33 billion pet industry. Our members represent more than 90% of registered veterinary medicine sales in Australia.

Veterinary medicinal products are essential tools for veterinarians and farmers to promote and protect animal health and welfare, food safety, public health, environmental health, agricultural production and trade, sustainability, innovation and investment. Animal health is the foundation of animal welfare and supports the sustainable production of safe, high-quality food and fibre derived from animals.

## **Prioritising animal health and welfare**

AMA acknowledges that producers are free to choose the farming system they use, whether conventional or organic. However, AMA’s primary concern is that regardless of the farming system, animal health and welfare must be protected.

It is unethical to withhold veterinary medicines from a sick or injured animal in order to protect a specific marketing claim. If an animal is sick or injured, it should be treated promptly with safe and effective veterinary medicines that will not pose a health risk to people who consume or use the resultant animal-derived commodity.

Only veterinary products approved by the Australian Pesticides and Veterinary Medicines Authority (APVMA) should be used on food-producing animals. Registered products are rigorously tested to ensure they are effective and safe to use (for both the animal and the person administering the product). This regulatory process provides confidence for the consumer that the resultant meat, milk, eggs or fibre will be safe to consume or use.

Veterinary medicines that have not been approved by the APVMA pose significant risks of residue violations in the resultant commodities. Unapproved veterinary medicines may be ineffective or inappropriate for the condition being treated, and their use can lead to prolonged, avoidable pain and suffering.

To protect animal health and welfare in an organic farming system, there should be a clear pathway to enable an animal to be transferred from an organic supply chain to a conventional system in order to protect its health and welfare. Sick or injured animals should be treated with safe and effective registered veterinary medicines, regardless of the farming system. Withholding veterinary treatment on the basis of a production claim is unacceptable to consumers of both organic and conventionally-produced products.

## **Comments on proposed changes to the livestock standards**

AMA welcomes the stronger emphasis placed on animal health and welfare in the amended livestock standards, and clearer provisions to support the use of conventional medicines and veterinary treatment where needed. Greater clarity on the circumstances in which an animal may be treated with conventional veterinary medicines within an organic production system would be helpful, including mechanisms by which a treated animal may be transferred to a conventional production system if the treatment necessary for health or welfare purposes is inconsistent with organic principles.

AMA is pleased to provide the following comments on the proposed changes to the livestock standards.

### **1.13 Livestock**

AMA supports the proposed amendments to this section to place a stronger emphasis on animal welfare.

### **1.15 Livestock breeds and breeding**

Under *General Principles*, AMA notes the suggested amendment 'avoiding the need for painful husbandry procedures whenever possible'. While AMA supports this in principle, AMA notes that husbandry procedures can deliver considerable health and welfare benefits for the animal (such as tail docking to minimise fly strike), and the pain associated with such procedures can be effectively

controlled with multi-modal analgesia. Producers should consider the short-term impacts of a husbandry procedure against the long-term health and welfare benefits for the animal.

### **1.16 Livestock nutrition**

Under point 1.16.7, the prohibition of antibiotics and coccidiostats in feed is identified. It is not clear if the prohibition only applies to their use for the purposes of growth promotion or production, or if it also prohibits their use for therapeutic purposes. Antibiotics and coccidiostats are important therapeutic tools that protect animal health and welfare, and are often administered via feed. AMA would request greater clarity is provided on the therapeutic use of antibiotics and coccidiostats, particularly those that should be administered via feed or water, in organic production systems.

### **1.17 Disease prevention and treatment**

AMA supports the ability to use veterinary medicines in organic systems. It is important that animal welfare is prioritised above organic ideals so that sick or injured animals can be treated to relieve pain and suffering quickly and effectively.

It is acknowledged that the use of mRNA vaccines has not been addressed in these proposed changes. mRNA technologies are an important new technology in animal health, especially against viral animal diseases. AMA notes that mRNA vaccines do not change the DNA of the animal, so a vaccinated animal would not become a 'genetically modified organism'. mRNA vaccines should therefore be considered in the same way as 'traditional' veterinary vaccines and their use be permitted in animals in an organic production system.

In point 1.17.2, it is not clear what is meant by '*appropriate treatment*' to relieve pain and suffering. It is not clear if conventional veterinary medicines and treatments are considered 'appropriate' when an animal is sick or injured. From an animal welfare perspective, pain and suffering should be relieved as quickly as possible by the *most effective treatment* available, whether organic or conventional.

Point 1.17.4 enables the use of conventional veterinary medicines when the substances in Appendix D are ineffective. However greater clarity on such circumstances would be welcomed. AMA has concerns that animals may be in pain or suffer for prolonged periods while Appendix D treatments are trialled and found to be ineffective, before a conventional veterinary medicine may be administered. Producers should be able to choose to use a conventional veterinary medicine straight away when an animal is sick or suffering.

Point 1.17.7 identifies coccidiostats as growth promotants. Coccidiostats are important therapeutic tools to treat the disease coccidiosis, which causes significant negative outcomes for animal health and welfare. Coccidiostats are not growth promotants and should remain available for use as therapeutic tools.

### **1.18 Livestock welfare**

AMA supports the explicit priority given to animal welfare through the optimisation of animal health, nutrition, living environment, behaviour and mental state in organic production systems in point 1.18.1. The clear objective to minimise pain and the requirement for trained personnel to perform husbandry procedures is also welcomed (points 1.18.3 and 1.18.4).

AMA notes that there appears to be an inconsistency between point 1.18.5 and Appendix D. 1.18.5 states that registered pain relief products should be used for painful procedures in accordance with Appendix D. However most of the products listed in Appendix D are not registered as effective pain relief products. Registered pain relief products are rigorously tested and proven to provide superior pain relief properties to many of the substances in Appendix D. If animal welfare is to be genuinely prioritised as stated in the proposed amendments, then the use of the most effective pain relief products available should be prioritised, including the ability to use pain relief products that are registered by the APVMA.

The proposed new definition for 'anaesthetic' also specifies that the agent is registered in Australia. Most of the products identified in Appendix D are not registered with APVMA for pain relief or anaesthesia. This is inconsistent with the instruction provided by the standard.

AMA has concerns with point 1.18.5 and Table 5, which specifies husbandry procedures that must be accompanied by pain relief products from Appendix D. In particular, the identification of procedures where pain relief is recommended *but not required* includes castration, tail docking, dehorning or disbudding, and speying. These procedures are known to be painful and pain relief is essential to protect animal welfare. These husbandry procedures can be invasive and cause pain similar to surgical procedures - when appropriate pain relief is permitted at the discretion of a veterinarian. In order to genuinely protect animal welfare, AMA would suggest that effective pain relief is encouraged for *all* husbandry procedures in the first 2 columns of Table 5 (except for nose ring placement, ear tagging and micro-chipping).

### **1.19 Livestock housing**

AMA supports the principle that organic producers must establish and maintain living conditions that promote good health and natural behaviour of animals.

### **1.20 Livestock handling**

AMA supports the principle that animal handling, facilities and transportation should minimise stress and enhance welfare for the animals.

### **1.21 Livestock identification and 1.22 Livestock manure**

AMA supports the proposed amendments to these standards.

## **Appendix D**

As noted above, many of the products listed in Appendix D Table A4 are not registered with the APVMA. As such, their purity, safety and effectiveness for various uses cannot be assured, and manufacturing methods and sanitary standards cannot be verified.

AMA would suggest that the standards are modified to specifically refer to the registered products listed in Table A5, rather than 'Appendix D', to ensure that producers seek veterinary direction and use products that are known to provide effective pain relief.

Thank you again for the opportunity to provide input to the amendments of the livestock standards. AMA commends the greater emphasis placed on animal health and welfare outcomes, rather than the inputs to the production system.

If we can provide any further information, please do not hesitate to contact me.

Yours sincerely,

Dr Charmian Bennett

Director, Science and Policy