

1/08/2016

TO THE COMMISSION ON "THE REGULATION OF AGRICULTURE":

As Administrator of a National Boer Goat Association – 'BOER GOAT AUSTRALIA INC.' and a breeder of Dairy goats for over 30 years I would like to notify you of my concerns and those of our members in regards to the welfare of our goats here in Australia.

1. Breeders need to have better access to Veterinary drugs to treat their goats, as a retired Veterinary Nurse of some 25 years I have had first hand experience working with Vets who have none or very little knowledge of what treatments or dosages are required to achieve a positive outcome when treating goats. The majority of Drug companies do not want to pay to have licenced their products for use on goats due to the extensive and expensive processes required by law, it is therefore left up to the Veterinarian themselves to 'guess' what the appropriate dose rate should be considering that labelled for use on sheep and cattle.
2. We desperately need better access to more anti-inflammatory / pain killer drugs labelled for safe usage on our goats for a range of problems like Arthritis in the elderly goats to Joint ill in the very young kids, currently the meloxicam products for pain relief at lamb marking can't be used on goats that may be in the future used for milk production so can't be used for disbudding pain relief on dairy goat kids .
3. There is a desperate need to remove the 'Do Not Use statements' on labels that restrict our Vets from using sheep drenches & vet medicines on goats .
4. Most coccidiostats can't be used for dairy goat kids.
5. We Dairy goat breeders should have, which we do not have, is access to a Local Anaesthetic or numbing compound for use when we have to disbud or dehorn our very young kids at ages from 2 days to 10 days of age, the main method used to do this is the extremely hot, red hot fire heated iron placed onto the skull of the kid for approx.. 8 > 10 seconds. Sometimes when this iron is applied to the head the hair on the kids head actually erupts into flames and a lot of gentle force is required to keep the kid still to avoid the hot iron touching places that are very close like the eyes and ears. I have been told of Veterinarians having burnt down into the skull too far causing severe swelling of the eyelids for several days. By allowing breeders to get access to humane drugs to localise numbing of that area would be a huge step forward in animal welfare standards, something that is long overdue in this industry.
6. Another Dairy goat requirement for identification of registered kids is that of tattooing both ears, this is a particularly nasty process because unlike dogs and cats identified by tattooing when neutered they are under sedation, our young goats kids are not, the trauma of tattooing the ears with sometimes 4 digits in each is extremely painful, sometimes bleeding is evident and the kids are severely stressed, the allowed use of a Local Anaesthetic rubbed onto the ear would be welcomed by all. In an age where Animal Cruelty is something we need removed from our society it is time that Government regulations step up and provide breeders with easier access to drugs for treating their animals.
7. The number of Internal and External Parasitic drugs currently listed as licenced for use on goats is appalling, when it comes to external parasite control goat breeders only have the choice of 2 licenced products, that being Pestene Powder and Clout S, Clout S has been removed from sale, which leaves only Pestene Powder which is virtually useless, breeders with perhaps 2 or 3 can cope with using a powder, but those with much more up to hundreds and thousands of goats have had to go off label and purchase chemicals licenced for use on cattle. Dairy goat breeders who use the milk for human consumption have a very limited number of products for use on their goats.

8. Australia needs a default With- Holding Period (WHP) as happens overseas of say 35 days & /or a default Maximum Residue Limit (MRL) of say 0.01mg/kg because if a Vet medicine is not registered for that species the default is zero and labs can now test down to 1 part per billion.
9. Do Not statements on labels should only be used where there is a real need. ie a contraindication as very toxic to 1 species such as Rumensin in horses or Aspirin in cats which will kill them, not just because the registering company doesn't want to do the R&D to determine WHP for goats milk. Vets need to be able to use their discretion and knowledge but to do so they must either stop adding in these 'Do Not statements' onto labels or vets must be given the legal ability to over-ride these 'Do Not statements' .
10. To make the playing field for breeders of goats more in line with that of drugs available for sheep and cattle we need to have Government regulatory changes made now so that drug companies can provide the level of support to our thriving goat industry, we have been left behind for too long, our industry needs change now.

Kind regards,

Maureen Dean and Audrey Diffin - Administrators of BOER GOAT AUSTRALIA INC.

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