

ADVOCATES FOR ANIMALS

Response from Advocates for Animals

Government Consultation on castration and tail docking of lambs

Introduction

Advocates for Animals believes that routine painful mutilations such as castration and tail-docking of food animals are out of step with modern standards of respect for animal welfare and would like to see the Scottish Government, the industry and food retailers taking urgent measures to phase them out entirely.

When members of the public are made aware of these routine mutilations they are almost invariably shocked. When Advocates for Animals reviewed the regulation of mutilations in 2006¹, a TNS poll showed that 9 out of 10 respondents thought that all or some painful animal mutilations should be banned and the majority of respondents stated that they would prefer meat from un-mutilated animals². The public is now getting access to the previously hidden realities of farm animal mutilations as a result of film footage posted on the internet³.

The Farm Animal Welfare Council (FAWC) 2008 *Report on the implications of castration and tail docking for the welfare of lambs* pointed out that Codes of Welfare already state that sheep producers should consider carefully whether such mutilations are necessary, implying that they should not be routine procedures. However, according to the Report, it was apparent that 'these aspects of the Code are not having the desired impact in reducing the number of castrated or tail-docked lambs'⁴.

We were disappointed that the Government's response to the 2008 FAWC report⁵ did not indicate more urgency and enthusiasm to take a proactive role in solving this problem, either in setting targets for sheep producers to phase out routine castration and tail-docking, or in developing and mandating the use of local anaesthesia and post-operative analgesia for lambs.

While we welcome the Scottish Government's consultation on three of FAWC's recommendations, we would like to see far more being done to encourage the whole food chain (breeders, producers, retailers, pharmaceutical companies, drug regulators, and consumers) to enable routine mutilation to be ended, or to be carried out only with safe and effective pain relief both during and after the mutilation.

The reasons why the ancient practice of castration continues are themselves unclear. The Code states that it should be done only when there is a 'need to avoid welfare problems associated with the management of entire males'⁶ but FAWC considers that this can be addressed in many cases by segregation within flocks⁴. It is acknowledged that the situation is difficult when sheep are penned but, as the 2008 FAWC Report says: 'the adverse welfare consequences caused by any fighting must always be

weighed against the suffering associated with castration, particularly when it is being routinely done to every male lamb in a flock'.⁴

The Government response to the FAWC report recommends that retailers should only require castration 'on the basis of clear evidence of impaired meat quality'⁵. In both cases this would only apply to males kept for slaughter after puberty (around 6 months of age). Retailers confirmed to FAWC that there were 'no significant adverse issues of meat quality associated with entire male lambs up to 12 months of age.' FAWC concluded that lamb castration should often be avoidable and that 'in many cases castration was performed either out of habit or as an insurance policy'⁴.

Responses to consultation questions

Q1 Surgical castration of sheep should be prohibited except when performed by a veterinary surgeon using pain relief?

Yes. We believe that this is an essential reform and overdue. It is entirely unacceptable that a stockperson or other non-veterinarian may carry out surgical castration without veterinary supervision and without giving effective pain relief.

We believe furthermore that this change in the law should be extended to all methods of physical castration and make the following points in support of this view:

1. Surgical castration produces the most suffering

The evidence, as reviewed by FAWC, indicates that 'the greatest pain response of all methods [of castration] occurred with surgical castration. The severe distress responses of lambs also lasted for considerably longer, around 8 hours, compared with 3.5 hours or less for other castration methods.'^{4,7} Surgical interference has major disadvantages from 'inflammation, infection, the risk of haemorrhage and also the time needed for healing. The pain produced is associated with both the incision and the pulling of the spermatic cord and this will be followed by the pain caused by inflammation from the trauma and any subsequent bacterial infection'⁴.

Restricting surgical castration of animals at any age to veterinary surgeons using pain relief will discourage the practice and reduce suffering when surgery does occur. However, the local anaesthetic injection may itself be painful or distressing for the lamb and the risk of unnoticed or untreated post-operative infection will still exist. For these reasons we conclude that a complete phase-out of routine castration is the safest strategy from the point of view of animal welfare.

2. Pain is experienced at all ages

As FAWC points out, there is no longer any scientific justification for the assumption that pain relief is not needed for young lambs on the supposed grounds that they feel less

pain than older lambs⁴. It has been shown by Edinburgh veterinary scientists, since 1993 at least, that age has little effect on the behavioural pain responses of castrated lambs⁸, and that the peak cortisol responses are actually higher in 5-day old lambs than in older lambs⁹.

3. Long-term pain relief is necessary

The term 'pain relief' should include longer-term post-operative analgesia as well as local anaesthesia at the time of surgery, and only a veterinarian will be trained and competent to ensure that this is provided. Castration wounds can take weeks to heal and, according to FAWC, it is probable that lambs experience some level of pain following castration and tail docking, long after any local anaesthetic has ceased to be effective⁴. We are concerned that, even if surgery is carried out by a veterinary surgeon, the sheep producer who is paying for this service may be under pressure to economise on post-operative pain relief, making it essential to specify this requirement in legislation.

Animals may develop chronic pain, and possibly in some cases hyperalgesia (heightened pain sensitivity at the site) and allodynia (pain from normally non-painful stimuli) as a result of pain that is not relieved⁴. The long-term effects of castration may do permanent damage to the quality of life of the animal.

4. Other physical castration methods are also painful

We note that the large majority of lamb castrations today are not surgical (the majority using the rubber ring method). The Scottish Government's proposed change to the law, while necessary, would not affect the practice of the majority of sheep producers and breeders or the experience of the majority of lambs. The majority of castrated lambs would continue to experience pain and distress under the proposed new law.

The evidence makes it clear that all methods of physical castration are very painful. Advocates for Animals concludes that no castration, including the rubber ring, Burdizzo clamp or combined methods, should be permitted at any age without effective pain prevention (local anaesthesia and post-procedure analgesia).

4.1 Rubber ring method

FAWC's review concluded that 'Castration using a rubber ring is painful at all ages that have been studied' and 'in the absence of effective pain relief, lambs experience considerable pain in the period following application of the ring' . FAWC cites evidence of⁴:

- 'considerable pain and distress' up to 2 hours
- 'prolonged pain' for 3 days and

- pain associated with ‘the end-phase of the atrophy process and the point of maximum lesion size and severity, which was between 14 and 28 days following castration’.

Edinburgh veterinary scientists found 15 years ago that the rubber ring method caused lambs ‘considerable acute pain’ for up to 3 hours¹⁰, and Royal Veterinary College researchers in 2004 found that lambs experienced acute pain and showed abnormal behaviour patterns after rubber ring castration¹¹. Local anaesthetic (lignocaine) injected under the ring after application has been found to reduce pain-related behaviour by 78%¹². This demonstrates that anaesthesia is necessary but does not make the procedure entirely pain-free.

The ring method is probably also used on older lambs (over the current 1 week legal limit without anaesthetic), where it can lead to chronic inflammation, sepsis and pain⁴.

4.2 The Burdizzo clamp method

The clamp is initially very painful, producing a burst of intense pain as the nerves are crushed, and an ‘obvious pain response’ from the lamb⁴. Although the clamp subsequently deadens the nerves and has been proposed as an alternative to local anaesthesia in combination with the ring method, this is not a method of ‘pain relief’ that would be permitted for companion animals, zoo animals or sports animals and should not be accepted for food animals. When the clamp is used alone, swelling and inflammation of the testes can last for up to 10–14 days⁴.

4.3 The ban should be extended to all painful castration methods

The proposed reform leaves the rubber ring method (up to one week of age without anaesthetic) and the Burdizzo clamp (up to 3 months of age without anaesthetic) as legal methods. As shown above, these are both painful and distressing procedures and should be included in the ban.

The Scottish Government argues that there are no pain prevention methods currently available and appropriate for large-scale use on-farm. If the Government was to require pain relief for lamb castration by any method, as we propose, a market for the drugs would be created and pharmaceutical companies would respond to the new demand. Other methods, such as immunocastration, would also probably be offered and we note that FAWC recommends further research into this technique.

Advocates for Animals urges the Scottish Government to extend the proposed ban on surgical castration to all lamb castration methods that cause pain (i.e all the methods currently used), with a phase-out period to allow producers, retailers and drug companies to adjust to this reform.

Q2 Surgical tail-docking of sheep should be prohibited except when performed by a veterinary surgeon using pain relief?

Yes. We believe this reform is overdue. We agree that it should be illegal for a lamb's tail to be cut off, at any age, without anaesthetic and by a non-veterinarian. As with castration, the evidence is that surgical amputation of the tail causes 'considerably greater pain and distress' than other methods and 'the risks of infection and haemorrhage are considerable'⁴.

While this reform is necessary, it does not deal with the pain and distress caused by the commonest methods of tail-docking today. Most lambs are tail-docked by the rubber ring method or by a docking-iron (a heated metal knife pressed down on the tail and that cauterises the wound as it severs the tail).

Tail-docking is a painful mutilation. Docking by the rubber ring method is believed to be less painful than castration by rubber ring, but research has shown that it still causes 'acute pain and stress in lambs at all ages investigated including lambs of less than one week of age, for which its use without anaesthesia is restricted by law in the UK' and that the pain may be 'considerable'⁴. Hot-iron docking is known to be painful by those who use the method and produces cortisol responses similar to the rubber ring method, although it is less painful than the use of a cold knife. Often tail-docking is carried out at the same time as castration of male lambs, increasing their pain and distress⁴.

We would like to see the law on surgical docking extended to all tail-docking of lambs or sheep by any method (rubber ring, hot iron and auxiliary use of Burdizzo clamp), with a requirement for local anaesthetic and post-operative analgesia. It is not acceptable to cause pain to animals when this could be avoided either by breeding and managing sheep so that docking is unnecessary or by providing safe and effective pain relief.

We would like to see the Scottish Government give strong encouragement, including a timetable, to phase out routine tail-docking. There are several reasons for thinking that this could readily be achieved:

1. FAWC has raised the question of whether routine tail-docking is genuinely necessary to avoid flystrike. The practice may owe more to tradition than to necessity and may be used as a substitute for better control of diarrhoea and/or of blowflies and blowfly-strike⁴. Sheep producers could be given incentives and technical help to improve their practice in these areas.
2. Sheep breeds already exist (for example, the Wiltshire Horn, the Easy Care) that shed their own fleece in summer and have short tails. A legal phase-out of routine tail-docking would give an impetus to breeding and using breeds with short and thin tails.
3. As FAWC pointed out, retailers could encourage an immediate change to un-docked or naturally short-tailed sheep by specifying that their suppliers should not dock lambs.

Fear of not being able to sell an undocked lamb is probably one of the main reasons why producers continue routine docking.

Q3 Tail docking of lambs above the age of 3 months, using any method, should only be undertaken by a veterinary surgeon using pain relief?

We agree that the existing law that only a veterinarian can tail-dock a lamb over 3 months of age should be strengthened, by requiring in addition that both local anaesthesia and longer-term analgesia must be used.

However we disagree with the proposed age limit of 3 months because this would continue to allow tail-docking using the ring method (up to 1 week without anaesthetic) and the hot docking-iron method (up to 3 months without anaesthetic), possibly combined with the use of the Burdizzo clamp.

For the reasons already given in our response to Q2 above, we believe that tail-docking, as a painful mutilation, should never be carried out by any method without the use of anaesthesia and post-operative analgesia.

**Advocates for Animals
Edinburgh
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References

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