

BVA and SVS Response to Defra Consultation on Lamb Castration and Tail Docking

Introduction

- The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- Sheep Veterinary Society (SVS) is a specialist division of BVA, working to promote the prevention of disease and the welfare of sheep by providing a forum for discussion, distribution of research results and provision of advice on veterinary matters relating to sheep. SVS includes members from around the World and from all areas of the sheep industry.

Surgical Castration and Tail Docking

Please indicate your level of agreement with the following statements.

8.a) Surgical castration of lambs should only be permitted when carried out by a veterinary surgeon with an effective anaesthetic and analgesic.

Agree

Disagree – an anaesthetic should not be required

Disagree – an analgesic should not be required

Disagree – a veterinary surgeon should not be required

Disagree – this method should not be permitted under any conditions

Disagree – another reason or multiple reasons (please specify below)

Not sure

8.b) Please explain your answer.

As quoted in [BVA's policy on tail docking and castration](#), the FAWC report 1994 concluded that surgical castration caused significantly more distress than other methods. This position was reiterated in 2008. In addition to the acute and chronic pain associated with the surgical procedure, there is a significantly increased risk of infection in comparison to the rubber ring method. There is also risk of severe haemorrhage, and risk of prolapse of intestinal loops.

9.a) Surgical tail docking of lambs should only be permitted when carried out by a veterinary surgeon with an effective anaesthetic and analgesic.

Agree

- Disagree – an anaesthetic should not be required
- Disagree – an analgesic should not be required
- Disagree – a veterinary surgeon should not be required
- Disagree – this method should not be permitted under any conditions
- Disagree – another reason or multiple reasons (please specify below)
- Not sure

9.b) Please explain your answer.

Studies of behavioural and cortisol responses show that surgical docking causes significantly more pain compared with other docking methods, and as such the FAWC report 2008 recommended that surgical docking by anyone other than a veterinary surgeon should be prohibited.

Rubber ring castration and tail docking up to 3 months

Please indicate your level of agreement with the following statements.

10.a) Rubber ring castration of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic.

- Agree
- Disagree – an anaesthetic should not be required
- Disagree – an analgesic should not be required
- Disagree – this method should not be permitted for as long as 3 months
- Disagree – this method should not be permitted under any conditions
- Disagree – another reason or multiple reasons (please specify below)
- Not sure

10.b) Please explain your answer.

Assessment of behavioural and cortisol responses in lambs castrated using the rubber ring method suggest that this procedure is associated with acute pain. The lesions caused by the rubber ring are accompanied by behavioural changes indicative of chronic pain. We would like to see pain relief used in all methods of tail docking and castration. However, it is not possible to introduce this without either first licensing sufficient appropriate analgesic products or without the ability to import and use products that are licensed in Australia/New Zealand/Canada and the USA. Currently, unlicensed analgesics must be prescribed under the cascade and therefore can only be prescribed on a case-by-case basis. Requiring analgesic to be used in all docking and castration would require widespread prescription of unauthorised products, which is not permitted under the cascade and leaves the prescribing veterinary surgeon legally responsible for adverse reactions and unforeseen consequences.

There are three licensed local anaesthetic available to use in sheep, all of which contain procaine hydrochloride. There are no authorised local anaesthetic POM VPS

products for sheep. This means that all local anaesthetics for use in sheep require a veterinary prescription. We consider that this is appropriate in these circumstances.

Currently all relevant products are injectable, risking potential unintended health and welfare risks, with farmers injecting multiple small doses to small lambs in less-than-ideal conditions.

11.a) Rubber ring tail docking of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic.

- Agree
- Disagree – an anaesthetic should not be required
- Disagree – an analgesic should not be required
- Disagree – this method should not be permitted for as long as 3 months
- Disagree – this method should not be permitted under any conditions
- Disagree – another reason or multiple reasons (please specify below)
- Not sure

11.b) Please explain your answer.

This method has been shown to cause acute pain in lambs of any age. Although evidence suggests that the pain associated with tail docking by this method is less than that caused by rubber ring castration, it is still considerable. The debilitating nature of acute pain can mean that very young lambs (before the ewe/lamb bond and feeding has been established) may ingest insufficient quantities of colostrum, predisposing the lamb to a range of diseases.

We would like to see pain relief used in all methods of tail docking and castration. However, it is not possible to introduce this without either first licensing sufficient appropriate analgesic products or without the ability to import and use products that are licensed in Australia/New Zealand/Canada and the USA. Currently, unlicensed analgesics have to be prescribed under the cascade and therefore can only be prescribed on a case-by-case basis. Requiring analgesic to be used in all docking and castration would require widespread prescription of unauthorised products, which is not permitted under the cascade and leaves the prescribing veterinary surgeon legally responsible for adverse reactions and unforeseen consequences.

There are three licensed local anaesthetic available to use in sheep, all of which contain procaine hydrochloride. There are no authorised local anaesthetic POM VPS products for sheep. This means that all local anaesthetics for use in sheep require a veterinary prescription. We consider that this is appropriate in these circumstances.

Currently all relevant products are injectable, risking potential unintended health and welfare risks, with farmers injecting multiple small doses to small lambs in less-than-ideal conditions.

12. What actions are needed from government and relevant stakeholders to support industry in moving away from this method?

The primary action needed is to license appropriate pain relief products for farmers to use when docking and castrating, or to allow the use of permitted products from Australia and New Zealand and the USA, such as lidocaine and buccal meloxicam. There is also a need for data on the use of injectable NSAIDs in lambs before passive immunity is established.

We also need robust evidence of the impact of novel commercial methods, such as Clipfitter and Numnuts, before these can be seen as alternatives. Evidence so far is mixed, with some indications of serious welfare risks if not used correctly, and training and familiarity with the devices would be essential.

Clamp Castration up to 3 months

13.a) Clamp castration of lambs up to 3 months should only be permitted with an effective analgesic.

- Agree
- Disagree – an anaesthetic should also be required
- Disagree – an analgesic should not be required
- Disagree – this method should not be permitted under any conditions
- Disagree – another reason or multiple reasons (please specify below)
- Not sure

13.b) Please explain your answer

Castration must only be carried out by a trained and competent person and in accordance with legislation. We would like to see pain relief used in all methods of tail docking and castration. However, it is not possible to introduce this without either first licensing sufficient appropriate analgesic products or without the ability to import and use products that are licensed in Australia/New Zealand/Canada and the USA. Currently, unlicensed analgesics have to be prescribed under the cascade and therefore can only be prescribed on a case-by-case basis. Requiring analgesic to be used in all docking and castration would require widespread prescription of unauthorised products, which is not permitted under the cascade and leaves the prescribing veterinary surgeon legally responsible for adverse reactions and unforeseen consequences

There are three licensed local anaesthetic available to use in sheep, all of which contain procaine hydrochloride. There are no authorised local anaesthetic POM VPS products for sheep. This means that all local anaesthetics for use in sheep require a veterinary prescription. We consider that this is appropriate in these circumstances.

Currently all relevant products are injectable, risking potential unintended health and welfare risks, with farmers injecting multiple small doses to small lambs in less-than-ideal conditions.

Combined method castration and tail docking up to 3 months

Please indicate your level of agreement with the following statements.

14.a) Combined method castration of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic.

- Agree
- Disagree – an anaesthetic should not be required
- Disagree – an analgesic should not be required
- Disagree – this method should not be permitted for as long as 3 months
- Disagree – this method should not be permitted under any conditions
- Disagree – another reason or multiple reasons (please specify below)
- Not sure

14.b) Please explain your answer.

Castration must only be carried out by a trained and competent person and in accordance with legislation. We would like to see pain relief used in all methods of tail docking and castration. However, it is not possible to introduce this without either first licensing sufficient appropriate analgesic products or without the ability to import and use products that are licensed in Australia/New Zealand/Canada and the USA. Currently, unlicensed analgesics have to be prescribed under the cascade and therefore can only be prescribed on a case-by-case basis. Requiring analgesic to be used in all docking and castration would require widespread prescription of unauthorised products, which is not permitted under the cascade and leaves the prescribing veterinary surgeon legally responsible for adverse reactions and unforeseen consequences.

There are three licensed local anaesthetic available to use in sheep, all of which contain procaine hydrochloride. There are no authorised local anaesthetic POM VPS products for sheep. This means that all local anaesthetics for use in sheep require a veterinary prescription. We consider that this is appropriate in these circumstances.

Currently all relevant products are injectable, risking potential unintended health and welfare risks, with farmers injecting multiple small doses to small lambs in less-than-ideal conditions.

15.a) Combined method tail docking of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic.

- Agree

- Disagree – an anaesthetic should not be required
- Disagree – an analgesic should not be required
- Disagree – this method should not be permitted for as long as 3 months
- Disagree – this method should not be permitted under any conditions
- Disagree – another reason or multiple reasons (please specify below)
- Not sure

15.b) Please explain your answer.

Tail docking must only be carried out by a trained and competent person in line with legislation. We would like to see pain relief used in all methods of tail docking and castration. However, it is not possible to introduce this without either first licensing sufficient appropriate analgesic products or without the ability to import and use products that are licensed in Australia/New Zealand/Canada and the USA. Currently, unlicensed analgesics have to be prescribed under the cascade and therefore can only be prescribed on a case-by-case basis. Requiring analgesic to be used in all docking and castration would require widespread prescription of unauthorised products, which is not permitted under the cascade and leaves the prescribing veterinary surgeon legally responsible for adverse reactions and unforeseen consequences.

There are three licensed local anaesthetic available to use in sheep, all of which contain procaine hydrochloride. There are no authorised local anaesthetic POM VPS products for sheep. This means that all local anaesthetics for use in sheep require a veterinary prescription. We consider that this is appropriate in these circumstances.

Currently all relevant products are injectable, risking potential unintended health and welfare risks, with farmers injecting multiple small doses to small lambs in less-than-ideal conditions.

Clip castration and tail docking up to 3 months

16.a) Clip castration of lambs up to 3 months should be permitted without an effective anaesthetic or analgesic.

- Agree
- Disagree – an anaesthetic should be required
- Disagree – an analgesic should be required
- Disagree – this method should not be permitted under any conditions
- Disagree – another reason or multiple reasons (please specify below)
- Not sure

16.b) Please explain your answer.

In Scotland, because of its mode of action, it is considered to be a method of castration or docking that can legally be used on lambs up to 3 months old without anaesthesia. This was based on a very small study (n=16 lambs clipped) which suggested that this method reduced the pain of castration to very low levels. We

want to see more substantive evidence of the benefits before aligning the legislation in England, Wales and Northern Ireland to that already in place in Scotland. We have concerns around the use of the Clipfitter in young lambs and would like more peer reviewed evidence to support its safe use in the younger age groups (newborns and above) and on a range of farm conditions.

17.a) Clip tail docking of lambs up to 3 months should be permitted without an effective anaesthetic or analgesic.

- Agree
- Disagree – an anaesthetic should be required
- Disagree – an analgesic should be required
- Disagree – this method should not be permitted under any conditions
- Disagree – another reason or multiple reasons (please specify below)
- Not sure

17.b) Please explain your answer.

In Scotland, because of its mode of action, it is considered to be a method of castration or docking that can legally be used on lambs up to 3 months old without anaesthesia. This was based on a very small study (n=16 lambs clipped) which suggested that this method reduced the pain of docking to very low levels. We want to see more substantive evidence of the benefits before aligning the legislation in England, Wales and Northern Ireland to that already in place in Scotland. We have concerns around the use of the Clipfitter in young lambs and would like more peer reviewed evidence to support its safe use in the younger age groups (newborns and above) and on a range of farm conditions.

Hot iron tail docking up to 3 months

Please indicate your level of agreement with the following statement.

18.a) Hot iron docking of lambs up to 3 months should only be permitted with an effective anaesthetic and analgesic.

- Agree
- Disagree – an anaesthetic should not be required
- Disagree – an analgesic should not be required
- Disagree – this method should not be permitted under any conditions
- Disagree – another reason or multiple reasons (please specify below)
- Not sure

18.b) Please explain your answer.

Tail docking must only be carried out by a trained and competent person in line with legislation. Where possible, pain should be minimised through the use of appropriate anaesthesia and analgesia used under the Cascade.

Evidence indicates that the pain response is similar to that associated with the rubber ring method. As the tail is removed at the time of the operation, FAWC takes the view that this method is preferable to the rubber ring method for older lambs with larger tails. We would like to see pain relief used in all methods of tail docking and castration. However, it is not possible to introduce this without either first licensing sufficient appropriate analgesic products or without the ability to import and use products that are licensed in Australia/New Zealand/Canada and the USA. Currently, unlicensed analgesics have to be prescribed under the cascade and therefore can only be prescribed on a case-by-case basis. Requiring analgesic to be used in all docking and castration would require widespread prescription of unauthorised products, which is not permitted under the cascade and leaves the prescribing veterinary surgeon legally responsible for adverse reactions and unforeseen consequences.

There are three licensed local anaesthetic available to use in sheep, all of which contain procaine hydrochloride. There are no authorised local anaesthetic POM VPS products for sheep. This means that all local anaesthetics for use in sheep require a veterinary prescription. We consider that this is appropriate in these circumstances.

Currently all relevant products are injectable, risking potential unintended health and welfare risks, with farmers injecting multiple small doses to small lambs in less-than-ideal conditions.

Stockkeeper training

Please indicate your level of agreement with the following statement.

19.a) Castration and tail docking of lambs should only be performed by a trained and competent stockkeeper.

- Agree
- Disagree
- Not sure

19.b) Please explain your answer.

All methods require correct application to be effective and to minimise pain. Some methods will require a veterinary surgeon.

20. What makes a stockkeeper trained and competent? Please select all that apply.

- On-farm training
 - Contracted (i.e. outsourced) training
 - Formal accreditation
 - Access to protocols (i.e. for providing pain relief)
 - Other – please specify below
- Recent/continued experience and continued mentoring by peers or vets

Age limits

Please indicate your level of agreement with the following statements.

21.a) Castration of lambs should only be permitted after the first 24 hours of life.

- Agree
- Disagree
- Not sure

21.b) Please explain your answer.

We disagree on designating a minimum age, and would support “castration should not be performed until the ewe/lamb bond has become established and the lamb has consumed an adequate amount of colostrum”. This would normally be at around 24 hours after birth, but it varies from lamb to lamb. A precise time limit would be difficult for farmers to adhere to, particularly in outdoor lambing systems where time of birth may not be known exactly. This is important because the debilitating nature of acute pain can mean that very young lambs may not ingest sufficient quantities of colostrum, predisposing the lamb to a range of diseases. Attention will be needed for male lambs who may also be tail-docked at the same time. Neither operation should be performed without appropriate pain relief at any age, once appropriate products are available.

22.a) Tail docking of lambs should only be permitted after the first 24 hours of life.

- Agree
- Disagree
- Not sure

22.b) Please explain your answer.

We disagree on designating a minimum age, and would support “tail docking should not be performed until the ewe/lamb bond has become established and the lamb has consumed an adequate amount of colostrum”. This would normally be at around 24 hours after birth, but it varies from lamb to lamb. A precise time limit would be difficult for farmers to adhere to, particularly in outdoor lambing systems where time of birth may not be known exactly. This is important because the debilitating nature of acute pain can mean that very young lambs may not ingest sufficient quantities of colostrum, predisposing the lamb to a range of diseases. Attention will be needed for male lambs who may also be castrated at the same time. Neither operation should be performed without appropriate pain relief at any age, once appropriate products are available.

Castration and tail docking over 3 months

Please indicate your level of agreement with the following statements.

23.a) Castration of lambs over 3 months should only be permitted when carried out by a veterinary surgeon with an effective anaesthetic and analgesic.

Agree

- Disagree – an anaesthetic should not be required
- Disagree – an analgesic should not be required
- Disagree – a veterinary surgeon should not be required
- Disagree – castration should not be permitted over 3 months
- Disagree – another reason or multiple reasons (please specify below)
- Not sure

23.b) Please explain your answer.

At this age, surgical castration is recommended and therefore must be performed by a veterinary surgeon using appropriate pain management, prescribed on the cascade. It is unlikely that surgical castration is carried out on lambs on a widespread basis and so the use of product would be considered on a case by case basis.

24.a) Tail docking of lambs over 3 months should only be permitted when carried out by a veterinary surgeon with an effective anaesthetic and analgesic.

Agree

- Disagree – an anaesthetic should not be required
- Disagree – an analgesic should not be required
- Disagree – a veterinary surgeon should not be required
- Disagree – tail docking should not be permitted over 3 months
- Disagree – another reason or multiple reasons (please specify below)
- Not sure

24.b) Please explain your answer.

At an older age, surgical removal of the tail is needed, and must be performed by a veterinary surgeon using appropriate pain management prescribed on the cascade. It is unlikely that surgical tail docking is carried out on lambs on a widespread basis and so the use of product would be considered on a case by case basis.

General feedback

25.a) Do you agree with the estimates and assumptions presented in the consultation-stage de minimis assessment (for example, time, cost, uptake of new methods, feasibility of pain relief use)?

- Yes
 No
 I'm not sure

25.b) If you answered 'No', please explain your reasoning. Where possible, provide alternative estimates or examples from your experience (for example, costs, procedure times, uptake of new methods).

26. Are you currently a sheep farmer or representing sheep farmers?

- Yes
 No

Further comments

33. Please provide any comments or evidence on the environmental impacts the proposed policy may have.

Making docking more expensive or complicated for farmers to perform may lead to an increase in the use of ectoparasiticides as an alternative way to control fly strike. This is contrary to attempts to reduce use of parasiticides due to growing concerns over resistance and environmental harms. It will be important to introduce any changes alongside appropriate engagement and training to mitigate this impact.

Conversely, increased availability of anaesthetics and analgesics could have also an indirect effect in reducing antibiotic use through behavioural change, and fewer instances of infection

34. Please provide any comments or evidence on the equality impacts the proposed policy may have.

35. Please provide any comments or evidence you feel should be considered concerning the socio-economic impact the proposed policy may have on both producers and consumers. Please explain your answer.

The Animal Welfare Committee (AWC) report on sheep castration emphasises the key role that retailers have on this issue as some retailers continue to require castration and indeed pay a premium for what they consider to be a higher quality product. A widespread belief continues that meat from uncastrated ram lambs is of lower quality than that from castrates, meaning that such meat often attracts a lower price. However, while ram taint exists, there is little objective evidence that this meat possesses an inferior flavour. The public perception that sheep farming is 'natural' means there is little push from consumers or retailers to improve welfare standards. Action to change consumer and retailer attitudes, and breed standards, would reduce the need for castration, where there is no other clinical or contextual reason for the procedure.

36. Please provide any further considerations you feel should be noted when considering this policy proposal. Please explain your answer.

We fully support the use of pain relief in castration and tail docking. However, we are unable to support the proposals in the consultation as there are currently no analgesics and a very limited number of anaesthetics licensed for use in sheep within the UK. Therefore, it is unworkable to safely prescribe pain relief until such products are available. There should be an urgent drive to license these products in the UK, including in Northern Ireland, to avoid the use of unauthorised products.

When needed currently, such products can be prescribed on a case-by-case basis by the farm's flock health veterinary surgeon under the cascade, provided appropriate withdrawal periods are observed and administration techniques are carefully followed. This is not however suitable if they are required en masse for all castration and tail docking procedures on farm, each year. Pain relief is necessary for welfare reasons, but the appropriate licensed products need to be made available first, otherwise it would be impossible to implement without misusing the cascade by relying on it for routine prescriptions. There are also potential welfare risks from the incorrect use of injectables if the current preferred option is used and there is no UK specific safety evidence for the widespread use of injectable analgesia. This puts the prescribing veterinary surgeon in a very difficult position.

Meloxicam has been shown to provide significant analgesic benefits to sheep, and products containing this active ingredient have been licensed for use in sheep in Canada and Australia. Care needs to be taken to avoid an overdose when calculating dose volume for small lambs and its use is contraindicated in lambs less than 14 days old.

There is emerging evidence that Lidocaine is a useful product for sheep castration and tail docking. Its use in sheep in the UK is currently banned due to the fact the maximum residue limits (MRLs) have not been established for Lidocaine in sheep entering the food chain in the UK. This is due to a lack of evidence but the recent review by AWC puts Lidocaine forward as a viable option for anaesthesia in sheep and notes the evidence of its safe use in countries such as Australia, New Zealand and Norway. We believe that appropriate analgesics and anaesthetics with currently established use in sheep should be licensed as such in the UK, or their availability fast tracked and allowed in the interests of sheep health and welfare.

There are specific reasons in the context of individual farms, including those supplying retailers that request castration, which mean that the option to tail dock and castrate is best decided upon following flock health planning discussions between the flock vet and the farmer.

Many vets and their farm clients have been successfully following the 3 R's principle (Refine, reduce, replace) as they have been considering this issue for at least the past decade. This has led to considered and informed decisions upon which groups, when, and how, to do these procedures, making changes from

traditional management practices. For example, some farmers are choosing to make long term breeding decisions such as actively selecting for sheep with naturally shorter tails within their breeding criteria, instead of relying on tail-docking.

There are welfare reasons as to why some flocks need to have the option to castrate and tail dock their lambs. These relate to flystrike and pregnancy misalliance, two issues that can be difficult to mitigate against in some systems, and carry significant welfare issues to a potentially large number of animals.

We support a review of the legislation, but we need the aforementioned changes (authorised safe, effective analgesia and anaesthesia, plus better evidence from the novel techniques) to be able to carry out the suggested changes.

We very much value the opportunity to have this debate and we are very keen to improve the welfare of UK lambs but we are equally very keen that legislation is not pushed through quickly or without very careful consideration of appropriate evidence.