

11 August 2025

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Via: awconsultation@dpird.nsw.gov.au

Dear Peter

Re: Post-Consultation Feedback on draft Australian Animal Welfare Guide – Virtual Fencing

Thank you for involving Australian Dairy Farmers (ADF) in your consultation session on Friday 1 August regarding the draft *Australian Animal Welfare Guide – Virtual Fencing*. Through its representative, Justin Toohey, ADF took the opportunity to present a verbal response to issues raised in the draft paper as they relate to the dairy industry nationally.

In answer to your suggestion for further input by 11 August if thought necessary, I would like to reiterate some of the points made by Justin and raise additional points for your consideration and response where appropriate.

As the national representative body for dairy farmers across the six dairying States, ADF's mission is to improve the productivity and sustainability of dairy farmers in Australia. An important component of this broad remit is for ADF to promote the implementation of best-animal-welfare practices on each and every farm, and to support research and the adoption of new technology that would assist.

ADF strongly believes virtual fencing (VF) is one such technology that, in a relatively short period of time, is proving in Australia and overseas to offer significant benefits to farmers, their livestock and their land.

To say VF offers improved management of livestock understates its benefits. It also contributes through improved workplace health and safety (from less dependency on quad bikes, motor bikes, etc.); more convenient exclusion of cattle from sensitive areas such as riparian and/or erosion zones; reduced dependency on physical fencing across waterways that are prone to flooding; less environmental contamination from discarded/damaged fences; and monitoring of cattle for mass disturbance from wild dogs.

Some of these points in support of VF are missing from the current draft Guide, which would benefit from their inclusion.

The two following points cover issues of importance to ADF, and for which I would like a

response. Other comments have been provided for your consideration through the **attached** marked-up version of the draft Guide.

1. 'National' versus 'NSW'

ADF would appreciate clarification regarding the status of the draft Guide:

- While it has a DAFF header, it has a NSW watermark.
- It was stated at the meeting on 1 August that it is being drafted by NSW DPIRD as a *national* Guide for national reference (i.e., by all jurisdictions), but that NSW will proceed with it if it is not adopted nationally. Please confirm.
- It is noteworthy that this technology is already being utilised on around 25% of Tasmania's dairy herd. In answer to a question at the meeting about Tasmania's position on this draft Guide, it was stated that the draft Guide has already been accepted by all jurisdictions. Ipso facto, one could assume the Guide as currently worded will have no negative impact on existing operators in Tasmania should the Guide be adhered to through regulation in that State. Could you please confirm? It is unreasonable if it appears the Guide may be advising a standard that existing best practice technologies cannot meet or adhere to.
- If it is to be a national Guide, at what point are industry bodies in other jurisdictions going to be consulted during the drafting process?

2. 'Shock' versus 'pulse'

ADF's representative, Justin Toohey, stated the importance of using the correct terminology when referring to VF technology. ADF cannot state this strongly enough, and requests use of "shock" or "shocks" when referring to VF throughout the document be replaced with the more accurate nomenclature of "pulse" or "pulses".

ADF's fervent position on this is underpinned by a review of definitions for the two terms:

*An **electric shock** refers to the general experience of an electrical current passing [earthed] through the body, potentially causing injury or even death. An **electric pulse**, on the other hand, can refer to a specific, controlled application of electrical current, often for therapeutic or industrial purposes.*

In ADF's view, statements like, "Aversive stimuli such as electric shocks are a necessary requirement for VF technology to be effective", and "The electric shocks delivered by VF devices are considered aversive stimuli and induce an acute stress response" (p. 5 of the draft Guide), would be more accurate if "shocks" were replaced with "pulses". The underlying message being conveyed would be similar, but without the subjective and alarmist sentiment.

In concluding, ADF wishes to thank you and your team for developing this enabling document. The dairy industry is very keen for VF (and virtual herding) technology to be made available for

on-farm use; ADF sees this guide as a potentially seminal document.

On ADF's behalf, I look forward to further involvement if required. In the meantime, please contact our *Advisor – Animal Health, Welfare and Biosecurity*, Justin Toohey (justin@j2e.com.au, 0409 447 972) for any immediate follow-up.

Yours sincerely



Stephen Sheridan
Chief Executive Officer

CC: Justin Toohey

Att: Marked-up draft Guide