



3 May 2013

Animal Welfare Standards Public Consultation
Animal Health Australia
Locked Bag 3006
Deakin West ACT 2600

Dear Sir / Madam

Re Consultation Regulation Impact Statement on the Australian Animal Welfare Standards and Guidelines: Cattle

Background on Fonterra Australia Pty Ltd

Fonterra is responsible for more than one-third of international dairy trade. The company's Australian operations, based in Melbourne, have 10 manufacturing sites throughout Australia, employ around 2,000 people, and collect 1.7 billion litres of milk annually from roughly 1,300 farmer suppliers.

In Australia, we manage an integrated supply chain from the dairy farm, through all stages of processing and manufacturing, through to the sale and delivery of dairy products to wholesale and retail customers in domestic and export markets.

Fonterra is a market leader in the domestic consumer dairy market, with a portfolio of iconic brands including Mainland and Perfect Italiano cheeses, Western Star butter and Ski yoghurt. Fonterra also operates a dedicated sales channel for the foodservice industry for leading chefs, restaurants, cafés and hotels.

Introduction

Fonterra Australia Pty Ltd welcomes the opportunity to participate in Animal Health Australia's public consultation on the proposed Australian Animal Welfare Standards and Guidelines: Cattle.

Fonterra recognises the importance of a national approach to animal welfare standards, with a clear and consistent methodology for ensuring robust cattle welfare arrangements across Australia. Nationally-agreed standards and guidelines will provide assurance to customers, consumers and domestic and export markets that the welfare of cattle in Australia is protected and maintained.

Fonterra notes that the proposed Standards and Guidelines are based on current scientific knowledge and recommended practices as well as the positive animal welfare outcomes they support, and were developed in consultation with State and Territory governments, livestock industry organisations (including considerable input from the dairy industry), and other stakeholders.

Fonterra supports the comments contained within the submission on the draft Australian Animal Welfare Standards and Guidelines for Cattle prepared by Australian Dairy Farmers Limited and Dairy Australia on behalf of the Australian dairy industry.

General Principles

All dairy farmers are committed to ensuring their animals are well cared for. The implementation of clear and feasible animal welfare standards will ensure consistent achievement of requirements for revised animal welfare outcomes across the dairy industry in all States and Territories.

Fonterra recognises the guiding principles of the UK Farm Animal Welfare Council 'Five Freedoms', as outlined in the National Dairy Industry Animal Welfare Strategy 2012-2017, as the framework for achieving good animal welfare outcomes for dairy cattle.

1. Freedom from hunger and thirst – by ready access to fresh water and a diet to maintain full health and vigour
2. Freedom from discomfort – by providing an appropriate environment including shelter and a comfortable resting area
3. Freedom from pain, injury and disease – by prevention or rapid diagnosis and treatment
4. Freedom to express normal behaviour – by providing sufficient space, proper facilities and company of the animal's own kind
5. Freedom from fear and distress – by ensuring conditions and treatment which avoid mental suffering

Comments

Fonterra wishes to express its support for the proposed national standards as currently drafted (Option B in the consultation Regulation Impact Statement) as the basis for development of legislation. This option is relevant to Australian dairy farming practices and will help to achieve the animal welfare outcomes identified as priorities in the National Dairy Industry Animal Welfare Strategy.

Fonterra supports the proposed guidelines which – although they will not be incorporated in the legislation – are appropriate for consideration under industry extension programs and will assist in continuing to drive improvement in animal welfare, as well as increasing industry knowledge and understanding.

Fonterra would be disappointed if the proposed national standards were converted into voluntary guidelines as per Option A (i.e. the minimum intervention option) as this would not provide uniformity of implementation and is unlikely to result in an improvement upon the outcomes of the current codes of practice.

Fonterra does not support the variations to the proposed national standards, detailed under Option C in the consultation Regulation Impact Statement. There does not appear to be the required scientific justification for more stringent requirements such as these. It is important that standards are proportionate to the animal welfare risks and do not impose unrealistic compliance burdens without scientifically-verifiable benefit.

However, in reference to Variation C6 (banning induction of early calving except for veterinary requirements), Fonterra would be in favour of nationally-agreed targets and guidelines to reduce the practice of induction through the setting of annual limits at the herd level (similar to the principles of the Induction Memorandum of Understanding in New Zealand). Fonterra does not support Variation C6 in its current format, as it is likely to have a significant financial impact on seasonal calving herds.

Conclusion

Fonterra is committed to working with its farmer suppliers to achieve the highest levels of animal care, and supports industry initiatives that deliver improved animal welfare outcomes such as the National Dairy Industry Animal Welfare Strategy. Fonterra looks forward to the development of clear, robust legislation based on the draft Australian Animal Welfare Standards: Cattle to achieve nationally-consistent, enforceable requirements for improved animal welfare. This will build on significant progress made to date and provide assurance to consumers and customers that the dairy products they purchase are subject to a high standard of animal welfare throughout the supply chain.

Yours sincerely

A handwritten signature in black ink that reads "Heather Stacy". The signature is written in a cursive, flowing style.

Heather Stacy
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