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6 May 2013

Animal Welfare Standards Public Consultation
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To Whom it May Concern

**Submission on
Draft Australian Animal Welfare Standards and Guidelines for Cattle**

Norco Co-operative Ltd welcomes the opportunity to contribute to the public consultation relating to the draft Australian Animal Welfare Standards and Guidelines for Cattle.

Please find attached our submission for your consideration.

Yours sincerely
NORCO CO-OPERATIVE LIMITED



MARK MYERS
Co-operative Secretary



6 May 2013

Submission on Draft Australian Animal Welfare Standards and Guidelines for Cattle

Submission by Norco Co-operative Ltd.

Norco Co-operative Ltd welcome the opportunity to contribute to the public consultation relating to the draft Australian Animal Welfare Standards and Guidelines for Cattle.

Norco Co-operative Ltd is a farmer owned Co-operative with a farm supply base spread across Northern NSW and South East Queensland. Norco has 161 members supplying 154 million litres of milk annually.

Norco and its members are committed to the care of all dairy animals and support the dairy industry position on animal health and welfare. We understand the relevant animal welfare guidelines will be incorporated into industry programs through the National Dairy Industry Animal Welfare Strategy.

Option B in the Regulatory Impact Statement is fully supported by Norco as the basis for developing and implementing consistent legislation and enforcement across Australia.

We are aware of the significant amount of work undertaken in the development of the draft recommended standards and believe they will provide a robust basis for nationally consistent animal welfare legislation to achieve clear, consistent and enforceable requirements for improved animal welfare outcomes relevant to livestock industries in Australia.

The standards will provide a new and important legislative basis of animal welfare in Australia across a comprehensive range of animal care and husbandry that does not exist under current codes of practice and voluntary arrangements.

The Australian Dairy Industry has a record of working on continuous improvement in the area of animal health and welfare, which is evident by the numerous initiatives and research activities that have delivered good welfare outcomes.

Norco and its members believe it is important that the standards for animal welfare outcomes are based on current scientific knowledge and recommended practices appropriate for Australian farming systems. Industry bodies have actively contributed to the development of the draft standards along with jurisdictions, other industry representatives, scientists and welfare bodies. We understand during this process many alternatives and aspects of animal care and welfare needs were considered and evaluated. The draft Standards and Guidelines reflect this careful scrutiny and assessment.

Norco does not support the alternative options for the dairy industry included as variations in the Regulatory Impact Statement and would only support changes to the draft Standards and Guidelines for Cattle if there is an opportunity for further input and that any changes are scientifically sound, not excessively prescriptive and are proportionate to the animal welfare concern.

Addressing Specific Issues

Early Calving Induction

Option C6 in the Regulatory Impact Statement considers the banning of induction of early calving except for veterinary reasons. The recommended standards managing the welfare aspects of calving induction require

- *S7.3 A person in charge must ensure calving induction is done under veterinary advice; and*
- *S7.4 A person in charge must ensure that induced calves receive adequate colostrum or be humanely killed at the first opportunity and before they are 12 hours old. These standards reflect the current Model Code of Practice for Cattle.*

The Norco milk supply area is based on an all year round calving pattern. As such, it doesn't have the tight management of calving patterns as found in other areas. Therefore, whilst early calving induction is not an issue for our supply base, we understand that the practice of calving induction is important to some farmers in other areas.

Calving induction is a treatment to assist reproductive performance of the dairy herd particularly in seasonal calving dairy herds to align calving and peak nutritional requirements with maximum pasture availability. Welfare risks associated with calving induction can be managed effectively by the provisions of standard S7.3 that requires veterinary oversight to ensure the procedure is relevant to the reproductive management of the herd. Only suitable cows are selected and induced to minimise any adverse welfare outcomes.

In addition, the provisions of standard S7.4 require that when induced calves are born they receive prompt attention for their care that may involve humane killing for weak calves. For a seasonal calving herd with typical fertility the economic costs of not using induction can be significant due to the difficulty of getting cows-in-calf and the need to cull these cows and purchase replacements. Economic modelling is difficult to perform and it does not take into account the implications for biosecurity of the farm associated with the need to purchase cows or the workforce impacts.

Norco fully supports S7.3 and S7.4 and does not support Option C6 as it is not proportionate to the animal welfare risks and it would impose unreasonable economic consequences for a large number of dairy enterprises. The dairy industry has a high priority and active research and extension program towards improving reproductive performance and research is being conducted to identify alternative management strategies to reduce the need for calving induction in seasonal calving herds as part of the National Dairy Industry Animal Welfare Strategy.

Disbudding/dehorning

Option C5 in the Regulatory Impact Statement considers the banning of caustic paste disbudding. The recommended standard requires:

- *S6.5 A person in charge must consider the welfare of the calf when using caustic chemicals for disbudding and must only use it if the calf*
 1. *Is less than 14 days old; and*
 2. *Can be segregated from its mother; and*
 3. *Can be kept dry for 12 hours after treatment; and*
 4. *Is not wet.*

As highlighted in the Regulatory Impact Statement and the background information provided for the public consultation, scientists have demonstrated that paste disbudding causes less pain than other disbudding/dehorning procedures. Other welfare risks from the use of paste are associated with potential transfer of the paste to other sensitive tissues that can be readily managed by the provisions of standard S6.5.

The dairy industry policy encourages farmers to minimise the pain associated with horn removal by disbudding calves rather than surgical dehorning of older animals. Paste disbudding has significant benefits because it requires:

- minimal restraint to apply,
- it does not require specialized equipment and
- it is undertaken on younger calves less than 14 days old.

This makes it ideal to perform on dairy farms with an all year round calving pattern with small numbers of calves at a time, where it is not feasible to engage a professional contractor. A recent survey of dairy farmers indicated a high level of interest (40% of respondents) in using paste for disbudding.

The dairy industry fully supports S6.5 and does not support Option C5 as it would result in poorer welfare outcomes. The dairy industry is also supportive of reducing the need for disbudding/dehorning by the use of polled cattle and this is opportunity is being investigated through dairy industry research and genetic improvement initiatives. However at this stage the availability of suitable sires is limited.

Use of dogs on dairy farms

Option C4 in the Regulatory Impact Statement considers the impact of banning the use of dogs on calves less than 30 days.

The recommended standards require

- *S5.4 A person in charge must have a dog under effective control at all times during the handling of cattle; and*
- *S 5.5 A person in charge must ensure a dog is muzzled when moving calves less than 30 days old that are without cows.*

Well trained dogs are commonly present on dairy farms and we are not aware of a significant welfare risk that banning the use of dogs on calves would remedy. This alternative appears to have been derived from an extension of SB4.7 of the Land Transport Standards that apply to calves in trucks, saleyards and processing facilities where spaces are more confined and, in our experience, is not relevant to on-farm situations.

Norco does not support Option C4 and we would question whether standard S5.5 should be a guideline only, if referenced at all, rather than a regulated standard as there is limited welfare benefit above S5.4.

Tail docking

The recommended standards require the banning of tail docking as a management practice which is supported by Norco.

Standard S9.3 states *A person must tail dock cattle only on veterinary advice and only to treat injury or disease.*

Tail docking is not a practice that occurs in our supply area. We are aware of the previous existence of the practice in some areas and the significant efforts of the dairy industry through the National Dairy Industry Animal Welfare Strategy which has been working actively to discontinue the practice of tail docking of dairy cattle. Over the past 10 years there has been a dramatic reduction in the use of tail docking in those areas.

The dairy industry fully supports S9.3

Conclusion

Norco and its members are very committed to ensure that appropriate animal health and welfare standards are adhered to in the management of our cattle on our dairy farms. It is in our best interest that quality care is provided to our animals at all times. It is essential that consistent national Standards, based on good scientific evidence, are developed to be used by all farmers to achieve these outcomes.