



Hon John McVeigh MP
Minister for Agriculture, Fisheries and Forestry

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Animal Health Australia

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I refer to the letter of 8 March 2013, from Dr Mike Bond, Chief Executive Officer, Animal Health Australia (AHA), inviting participation in the public consultation on the proposed draft Australian Animal Welfare Standards and Guidelines for Cattle. Please find attached the Department of Agriculture, Fisheries and Forestry's (DAFF) comments on the standards and guidelines and associated Regulatory Impact Statement.

I acknowledge the work AHA has done in leading the development of this important initiative and thank AHA for the opportunity to contribute to the development process, through member participation in the Stakeholder Reference Group meetings.

If you require any further information regarding this matter, please contact Mr Ian Rodger, Senior Policy Officer, of DAFF on telephone 07 5453 5825 or email ian.rodger@daff.qld.gov.au.

Yours sincerely



DR JOHN McVEIGH, MP
Minister for Agriculture, Fisheries and Forestry
Member for Toowoomba South

Att

Comments on: Proposed Australian Animal Welfare Standards - Cattle

General Comments
<p>1. In general it is difficult to make a welfare benefit/cost comparison on the proposed standards as the document focuses mainly on costs of implementation of each proposed standard. An attempt needs to be made to cost the potential benefits ie. cost savings in retaining markets, or the cost savings due to increase productivity brought about by implementing a standard.</p> <p>The welfare benefit versus cost needs to be clearly stated to allow a true benefit/cost analysis to be made.</p> <p>For example, using the Cattle Standards, the control of dogs S5.4 focuses on cost of training dogs, however does not estimate financial savings in prevention of injuries and stresses that may reduce production. Similarly S3.2, S5.5, S6.7 cost benefit analyses follow the same pattern.</p>
<p>2. In assessing the criteria for comparing the net compliance costs to industry and government, there should be a clearer identification of the cost to government. The identified costs appear to be mostly industry based implementation costs. The cost to government to regulate standards needs to be clearly set out.</p>
<p>3. The tables should have some keys and explanations of symbols and derivations of discount rates etc: to inform readers.</p>
<p>4. The document compares Options (C1-7) against each other in terms of welfare benefits. Each option needs to be considered on its merit and compared to either the base case or the standard under Option B. For example comparing pain relief against tethering is inconsequential against the welfare benefits of pain relief.</p>
<p>5. Regarding statements on pages 35/36 of the Cattle Standards and Guidelines Regulatory Impact Statement under the feedlots and diet section:</p> <p>Statements indicating that unaccredited feedlots would have welfare impacts with respect to hunger or lack of necessary diet to maintain full health and vigour because the quantity and quality of feed can not be assured are not supported.</p> <p>Accreditation per se is not the only assurance of quantity and quality of feed.</p>

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<p>CATTLE Standards and Guidelines specific comments</p>
<p><u>General comments</u></p> <p>Queensland DAFF supports the Standards and Guidelines as written (Option B in the Regulatory Impact Statement).</p> <p>Queensland DAFF offers the following comments on the standards and RIS and in relation to the Options under consideration:</p>
<p>Proposed standard S3.2 - Unquantifiable incremental cost of inspecting cattle</p> <p>The RIS identifies costs associated with inspections. In Queensland regular inspections of cattle are an obligation under the <i>Animal Care and Protection Act 2001</i> (ACPA) as part of duty of care provisions; are current practice and are carried out during normal management procedures in accordance with the husbandry regime; therefore there should be no increase in costs associated with inspecting cattle.</p> <p>Regular inspections identify and help to prevent animal welfare issues (eg disease outbreaks, injuries and mortalities) and improve productivity resulting in net financial gain.</p> <p>There should be no increased impost over and above normal prevention of Cruelty to Animals (POCTA) legislation.</p>
<p>Proposed standard S5.4 - Effective control of dogs</p> <p>The assumption that the same number of dogs need training each year (as represented in the 10 year costing in the table) exaggerates the cost as it is unlikely that dogs need annual replacement and consequently annual costs associated with training. Training should be a reducing cost each year.</p> <p>The cost benefit analysis has focussed on the cost of training dogs only. The benefit in cost savings in having dogs under effective control should also be a considering factor due to:</p> <ul style="list-style-type: none">a) reduced loss of production from stock injured by uncontrolled dogs; andb) human labour savings of having well trained dogs. <p>For example: Un-controlled dogs can cause significant loss of production in milk and/or growth, higher costs of veterinary treatments, and behavioural and handling problems in cattle, causing higher labour and Workplace Health and Safety costs.</p> <p>The cost benefit indicated should be considered in the analysis to off-set the training costs identified.</p>

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Proposed standard S5.5 - Muzzling of dogs used to move calves under 30 days old

The analysis acknowledges the benefits of reducing stress on cattle but should also attempt to cost the increased productivity that result in reduced stress. The RIS has estimated a cost of implementing the standard - this should be balanced against the benefits.

The calculation of the number of dogs actually used to work bobby calves on dairies is debatable. Even if every dairy farm has a working dog it is unlikely that every farm would work bobby calves with that dog.

Proposed standard S5.6 - Exercise of tethered cattle

Letting tethered cattle off to walk around as exercise should be a NIL cost.

The off-leash example provided in the RIS should also be a NIL cost if the paddocks are appropriately fenced. This standard is largely applicable to animals kept as pets – it is unlikely that owners would hire someone to undertake supervision or exercise.

Proposed standard 6.5 – Caustic chemicals for disbudding calves less than 14 days old

The inclusion of the requirement to separate treated calves from cohorts (in addition to separation from the mother) should be considered and would provide an extra safeguard to unintended consequences of using caustic chemicals (eg. accidental brush off on cohorts).

Proposed standard S6.7 – Training or direct supervision requirement for spaying

Cost of training lay spayers has been estimated; however the financial benefits of having competent operators should also be similarly estimated. A monetary figure could be estimated for improvements in survival and weight gain for animals spayed by competent operators.

Proposed standard S6.9 - Use of vaginal spreaders for small or immature cattle

Suggest consider weight and age parameters to support the meaning of “small” or “immature” cattle to clarify enforcement of this standard for regulators.

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Comments on Options C1 – C7

Variation C1 – Incremental cost of pain relief for all spaying

The cost of pain relief is covered however the cost of lost production of not applying pain relief must also be considered.

The benefits of pain relief would be improved weight gain and productivity in addition to the overall welfare advantages that pain relief provides. For this cost benefit analysis to be balanced it must consider these benefits (not just the outlay costs).

The study by Petherick et al (2012) advised that pain relief should be provided for Dropped Ovary Technique (DOT) spaying and flank spaying. Passage spaying is similarly invasive and should also be considered as requiring pain relief as there has to be a significant incision in the vaginal wall as well as the ovarian ligaments.

Variation C2 – Incremental cost of banning flank spaying/flank webbing

Increased mortality rates associated with flank spaying/webbing appears not to be included. Mortality rates for DOT spaying are considerably lower.

Morbidity rates are also higher for flank spaying – this should be factored in as a cost.

Variation C3 – Incremental cost of banning permanent tethering

The benefits to the welfare of a tethered animal in allowing it to express natural behaviours far outweigh the cost of mowing or purchasing milk. The cost analysis seriously undermines the impact of a lifelong inability to express natural behaviours which is one of the “five freedoms” and a serious welfare issue.

The number of animals this will affect is so small that permanent tethering should be banned.

Variation C4 – Incremental cost of banning the use of dogs on calves less than 30 days old without their mothers

To be consistent with the Land Transport Standards, the Cattle standards should state that the use of dogs on calves less than 30 days old without their mothers is not permitted.

The RIS has estimated a cost of implementing the standard without addressing the benefits in increased productivity and workplace safety that would come from banning the use of dogs on calves less than 30 days old.

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Variation C5 – Incremental cost of banning caustic dehorning.

The RIS appears to suggest that banning caustic de-horning would require that producers would move to use a contractor, as inferred in the costing. Producers may instead use alternative methods of de-horning rather than a contractor.

The financial savings in banning caustic de-horning (ie preventing injuries to calves and their cohorts and associated treatments or loss of production) also needs to be included in any of the calculations.

The use of caustic chemicals as a method of de-horning in Queensland is not considered common practice.

Variation C6 – Quantifiable incremental cost of banning calf induction except for veterinary reasons

According to the RIS, the practice is mainly performed in Victoria and Tasmania.

There is a significant animal welfare impact of this practice.

Consideration must be given allow induction to be performed only under veterinary supervision and for the welfare of the cow or calf.

Consideration should also be given to allow jurisdictions the ability to approve the practice for herd management purposes within their area.

The calculation appears to assume that there will be 100% replacement of cows that would need to be induced that fall outside of the calving period. This assumption may be distorting the overall estimation of the cost of banning this practice.

Variation C7 – Incremental cost of banning electro-immobilisation (EI)

The examples provided in the RIS of current use of EI suggest use for routine husbandry procedures which are inappropriate for the level of restraint required (eg ear tagging).

EI should only be used in exceptional circumstances and not as a substitute for installing adequate facilities. Consideration should be given to adding that EI must not be used for routine husbandry procedures.

An animal needs to be restrained in order to apply the EI equipment so the assumption that there is an additional time cost or risk of injury if EI is banned is questionable.

A person can only attach EI equipment to a restrained animal - therefore the argument of increased risk of injury if EI is unavailable is debatable.

Compensation costs used are also unclear – the figures supplied of fatalities on cattle properties do not indicate the cause of the injuries and whether the use of EI would have alleviated the risk or prevented the injury.

The cost of compensation is not a valid argument without evidence that there was an association with the absence of EI versus a cattle crush or other form of restraint.

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