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## Queensland Dairyfarmers' Organisation Ltd

submission to the

### Draft Australian Animal Welfare Standards and Guidelines for Cattle

The Queensland Dairyfarmers' Organisation Ltd (QDO) has prepared the following submission to complement the Dairy Industry submission prepared by Australian Dairy Farmers Limited and Dairy Australia and to highlight particular issues that are very important to the Northern Dairy Industry.

The QDO is the peak industry organisation representing the interests of and providing services to Queensland dairy farmers.

The QDO is committed to good animal welfare outcomes and was proactively one of the first States to develop and implement a dairy farm animal management and welfare guidelines, which was partnered with the Subtropical Dairy Program and endorsed by both Government and the RSPCA.

The QDO recognizes and believe it is extremely important that the standards for animal welfare outcomes are based on current scientific knowledge and recommended practices appropriate for Australian farming systems.

The QDO along with and through ADF have actively contributed to the development of the draft standards along other industry representatives, scientists and welfare bodies. Through this drafting process the QDO understands that many alternatives and aspects of animal care and welfare needs were considered and evaluated and as such the draft Standards and Guidelines reflect this careful scrutiny and assessment. Due to the rigor of this process the QDO 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.

The QDO supports the draft recommended Animal Welfare Standards for Cattle (Option B in the Regulatory Impact Statement) as the basis for developing and implementing consistent legislation and enforcement across Australia.

The QDO also supports the relevant animal welfare guidelines being incorporated into dairy industry programs through the National Dairy Industry Animal Welfare Strategy.

**Disbudding/dehorning:** Option C5 in the Regulatory Impact Statement considers the banning of caustic disbudding. The QDO does not agree with this option.

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.*

The QDO supports the recommended standard S6.5.

In Queensland many dairy farmers see the use of disbudding paste as a safe and less stressful and easier to use means of disbudding than some other commonly used methods. When disbudding paste had been previously approved it had been successfully used by many Queensland dairy farmers with very few problems. It has been found to be more practical and least stressful in reducing the later need for dehorning than other methods currently available.

In the Regulatory Impact Statement and the background information provided for the public consultation, it is highlighted that scientists have demonstrated that caustic disbudding causes less pain than other disbudding/dehorning procedures. Other welfare risks from the use of caustic paste are associated with potential transfer of the caustic paste to other sensitive tissues that can be readily managed by the provisions of standard S6.5. Queensland farmers are aware of these issues that the need to use disbudding paste carefully and in the right environment.

The use of disbudding paste also directly aligns with national dairy industry policy which encourages farmers to minimise the pain associated with horn removal by disbudding calves rather than surgical dehorning of older animals. The use of disbudding paste 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 practical to perform on dairy farms with all-year calving with small numbers of calves at a time, where it is not feasible to engage a professional contractor, as is the case for the majority of Queensland dairy farms.

As presented by Dairy Australia a recent survey of dairy farmers indicated a high level of interest (40% of respondents) in using caustic paste for disbudding.

The QDO fully supports S6.5 and does not support Option C5 as it would result in poorer welfare outcomes.

The QDO is also supportive of reducing the need for disbudding/dehorning by the use 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 QDO does not agree with this option.

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.*

The QDO supports the recommended standard S5.4.

The use of well trained dogs is a necessity on dairy farms and the QDO is not aware of any animal welfare risks that would be mitigated by banning the use of dogs to manage calves.

**Tail docking:** The recommended standard S9.3 require limiting the use of tail docking as a management practice only based on veterinary advice and only to treat injury or disease. This is supported by the dairy industry, including the QDO.

While tail docking is not a common practiced in Queensland, the QDO has supported the National Dairy Industry Animal Welfare Strategy working to actively discontinue the practice of tail docking of dairy cattle. As reported by Dairy Australia, over the past 10 years there has been a dramatic reduction in the use of tail docking (47% of farms in 2005 and 18% of farms in 2012). The recent farmer survey indicates there is widespread awareness that the dairy industry does not support tail docking.

**Early Calving Induction:** The QDO supports the position presented by Australian Dairy Farmers and Dairy Australia. While seasonal calving is not a common practice in Queensland, there are circumstances where calf induction is necessary on the grounds of animal welfare.

As such the QDO supports S7.3 and S7.4 where, “*A person in charge must ensure calving induction is done under veterinary advice; and 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,* and as such QDO does not support Option C6 in the Regulatory Impact Statement where it considers the banning of induction of early calving except for veterinary reasons.

**Electro-Immobilisation:** Option C7 in the Regulatory Impact Statement considers the impact of banning the use of electro-immobilisation of cattle. The QDO does not agree with this option.

The QDO believes electro-immobilisation is an important cattle management tool, particularly for being able to treat large sick and or injured animals in a safe manner.

The QDO is available to further discuss any of the issues raised in this submission.

Yours sincerely,



**Brian Tessmann**  
**President**

**Queensland Dairyfarmers' Organisation Ltd**