



United Dairyfarmers of Victoria Submission on

Draft Australian Animal Welfare Standards and Guidelines for Cattle

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About the United Dairyfarmers of Victoria (UDV)

The UDV is a member based organisation for Victorian dairy farmers and represents farmers on a range of issues from federal, to state and local government, and the wider community.

The UDV advances and promotes the commercial, environmental and social interests of over 2,300 dairy farmer members.

The UDV is the dairy commodity of the Victorian Farmers Federation (VFF). Through the UDV, members join the strength of the VFF/NFF and the ADF Ltd.

The VFF is the largest state farmer organisation in Australia, representing over 10,000 members who live and work on more than 6,000 farm businesses situated across Victoria.

The VFF consists of seven Commodity Groups - Dairy (United Dairyfarmers of Victoria), Livestock, Grains, Horticulture (incorporating Flowers Victoria), Chicken Meat, Eggs and Pigs - as well as four Committee groups - Water, Land Management, Farm Business and Rural Development and Farm Security.

The Victorian Dairy Industry

The dairy industry is Victoria's largest rural industry, with a gross value of raw milk production of around \$2.48 billion in 2010-11. The industry is mature, well resourced, well organised and internationally competitive. The Victorian dairy industry, a vital contributor to the state economy, accounts for just over half of the national dairy manufacturing workforce.

There are approximately 4,588 farms in Victoria – spread relatively evenly between the three production regions. Dairy farms are predominantly located in the North, South-West and Gippsland regions. The Northern region is predominantly irrigated farms, while the South-West and Gippsland are mainly dry land farms. The Macalister Irrigation District is the major irrigated dairy region in Gippsland. In 2010-11 the Victorian dairy herd totalled around 1 million head.

In 2011-12, Victorian food and fibre exports were valued at \$9 billion in 2011-12. Victorian dairy exports (86% of national dairy exports) represented \$1.96 billion of this. Export successes are mainly due to the industry's efficient, pasture-based dairy farms, the availability of grain as a cost-effective feed supplement and a progressive and efficient processing sector that researches and develops products to suit customer needs, however the high Australian dollar and recent decreases in international dairy product prices continue to present challenges to the ongoing stability of farm gate milk prices. Dairy products account for the largest export category from the Port of Melbourne. The domestic market is also an important consumer of manufactured and liquid milk products. Despite the recent instability in financial markets leading to conservatism in expenditure and a shift to cheaper eating options, domestic demand remains relatively strong.

The dairy industry welcomes the opportunity to contribute to the public consultation concerning the draft Australian Animal Welfare Standards and Guidelines for Cattle.

The UDV supports the Australian Dairy Farmers and Dairy Australia submission and therefore 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 dairy industry is committed to the care of all dairy animals and the relevant animal welfare guidelines will be incorporated into industry programs through the National Dairy Industry Animal Welfare Strategy.

General Comments

The UDV, in representing the Victorian dairy industry, supports the draft Australian Animal Standards and Guidelines for Cattle. At the national level the UDV is involved in these matters through our national representative body, the Australian Dairy Farmers.

The dairy industry is involved in the development of the standards as we 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 an important legislative basis for 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 UDV believes that the legislated standards will provide much sought after national consistency.

We wish to highlight that the UDV continues to actively support dairy initiatives and research activities designed to deliver good welfare outcomes beyond the proposed minimum requirements through the National Dairy Industry Animal Welfare Strategy.

The UDV is concerned when people from outside the industry fail to acknowledge industry advances in animal welfare, when science is not recognised (or worse dismissed) as an important consideration in determining appropriate animal health and welfare practice, and when the overseas farming practices are promoted without an appropriate consideration of the uniqueness of Australian farming practices.

We would be concerned if changes were proposed without due consultation with the dairy industry.

Specific Comments

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.

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.

Seasonal calving herds are more likely to be found in Victorian and Tasmanian herds than in other parts of the country. A recent industry survey indicated that the use of induction as a reproductive management tool in western Victoria was used often (14%) and used occasionally (18%) of herds and in Gippsland was used often (14%) and used occasionally (10%) of herds.

The dairy industry policy supports the implementation of agreed management strategies to achieve a reduction in the requirement for calving induction.

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.

The dairy industry 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 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.*

In the Regulatory Impact Statement and the background information provided for the public consultation, 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.

The dairy industry policy encourages farmers to minimise the pain associated with horn removal by disbudding calves rather than surgical dehorning of older animals. Caustic 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.

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 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 the dairy industry is not aware of a significant welfare risk that the 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 and it is not relevant to on-farm situations.

The UDV supports the dairy industry position and not support Option C4. It seems that S5.5 should be a guideline rather than a regulated standard due the lack of an identified welfare benefit.

Tail docking

The recommended standards require the banning of tail docking as a management practice which is supported by the dairy industry. Standard S9.3 *A person must tail dock cattle only on veterinary advice and only to treat injury or disease.*

The dairy industry has worked 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 (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 and it is now appropriate for the practice to be banned by legislation.

The UDV supports the dairy industry position on this issue.

Conclusion

The dairy industry has a high priority for animal health and welfare and looks forward to the finalisation of the Australian Animal Welfare Standards and Guidelines for Cattle. UDV supports the work of the dairy industry representatives towards the development of consistent national legislation based on the Standards.