



26th April 2013

Animal Welfare Standards Public Consultation
Locked Bag 3006
DEAKIN WEST ACT 2600

Dear Sir/Madam

Please find the WAFarmers Federation Dairy Section's submission outlined below.

Kind Regards

A handwritten signature in black ink that reads "Phil Depiazzi". The signature is written in a cursive style with a prominent dot above the 'i'.

Phil Depiazzi

WAFarmers Federation Dairy Section President

WAFarmers Dairy Section Submission

- Australian Animal Welfare Standards and Guidelines for Cattle

General Comment

WAFarmers Dairy Section welcomes the opportunity to contribute to the public consultation concerning the draft Australian Animal Welfare Standards and Guidelines for Cattle. WAFarmers exists to act as a voice on behalf of the states dairy farmers and lobby for the best possible outcomes to ensure a sustainable and profitable future for this agricultural sector. WAFarmers is the peak policy body for West Australian dairy farmers on issues of state and national importance. In this submission WAFarmers represents the current dairy farmer members of the organisation.

West Australian dairy farmers contribute to the industry which is considered one of Australia's major rural industries. Based on national farm gate value of production, it is ranked third behind the beef and wheat industries. There are approximately 6,900 dairy farmers across Australia producing close to 9.5 billion litres of milk annually, for a farm gate value of just under \$4 billion.

The West Australian dairy industry 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 dairy industry in West Australia 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. The dairy industry animal welfare policy has been developed in consultation with WAFarmers.

The standards will provide a new and important legislative basis and level 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. We recognize that the legislated standards are minimum requirements and we welcome national consistency. Notwithstanding the dairy industry has a record of working on continuous improvements in animal welfare which is evident by the numerous initiatives and research activities to deliver good welfare outcomes beyond the proposed minimum requirements. We are committed to continue these activities and have a National Dairy Industry Animal Welfare Strategy that drives implementation of industry animal welfare policy of which WAFarmers supports.

WAFarmers Dairy Section recognise and 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. WAFarmers Dairy section on behalf of the West Australian dairy industry 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. WAFarmers Dairy Section caution against changes to the recommended Standards that are more stringent and if incorporated in legislation would: be difficult to verify; not provide a significant welfare benefit; and be relevant for all production systems and persons responsible for cattle. The section endorses standards that do not impose unrealistic compliance burdens and are not disproportionate to the animal welfare risks.

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. 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; and also standard S7.4 so that when induced calves are born they receive prompt attention for their care that may involve humane killing for weak calves.

The dairy industry policy supports the implementation of agreed management strategies to achieve a reduction in the requirement for calving induction. Since implementing the National Dairy Industry Animal Welfare Strategy in 2005 there has been a decrease in farmers using calving induction. From a farmer survey in 2012 it was estimated that induction is used on about 20% of dairy farms but only 2.1% of all dairy cows nationally were induced.

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.*

As highlighted 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. This makes it ideal 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. A recent survey of dairy farmers indicated a high level of interest (40% of respondents) in using caustic 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 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 dairy industry does not support Option C4 and the industry questions whether standard S5.5 should be a guideline 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 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 through the National Dairy Industry Animal Welfare Strategy 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 dairy industry fully supports S9.3

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. The WAFarmers Federation Dairy Section is willing to continue to contribute to this process and towards the future development of consistent national legislation based on the standards.