

## **Bobby calf starvation proposal**

**Against Animal Cruelty Tasmania welcomes the opportunity to comment upon the proposal to increase 'time off feed' for bobby calves. In presenting this submission, we note that this proposal affects about 700,000 baby animals, and we make the following observations:**

1. AACT objects in principle, and in the strongest possible terms, to the treatment of baby animals as 'waste products' to be 'disposed of' in the cheapest and most inhumane manner. The **only** 'humane solution' for these 'unwanted' and very vulnerable baby animals is, if they must be destroyed, for them to be humanely shot by a licenced and competent (accredited in humane destruction) shooter 'on farm', and if they are to be used for meat, then refrigerated.

2. That most conservative of animal 'welfare' organisations in the country, RSPCA Australia, objects to the proposal of increasing time off feed for bobby calves on the following grounds:

- bobby calves should be fed every 12 hours
- calves should be fed within four hours of leaving the property of origin and this feed should be equivalent to half the calves' daily ration
- the time of feed should be recorded and accompany the calves to their destination to ensure timely provision of feed to calves not slaughtered within 12 hours of their last feed
- the time interval from farm to abattoir should not exceed 10 hours
- bobby calves must, where possible, be transported directly to the abattoir.

RSPCA Australia also notes that calves younger than 5 days often are involved in this arduous process.

It is, however, AACT's understanding that this 'time-off feed'/ deprivation of essential nutrients is already widespread and this is the dairy industry's way of legitimising, or legalising it with as little public awareness as possible.

3. The so called 'scientific evidence' was commissioned by the Dairy Industry, which clearly has vested commercial interests that can bear no possible relationship to the welfare of these baby animals; that is, there can be no possible evidence which would attest that the animals do not suffer immense physiological and other harm, suffering and distress from extending time off feed, transport times, or time in saleyard or slaughterhouse premises. In other words, any such research should obviously have been peer-reviewed and drawn from independent, authoritative providers rather than solely from the industry with everything to gain at the expense of the welfare of the animals.

4. The arguments being put in favour of this proposal assume that the bobby calves have been prepared and transported in a welfare compliant manner. The sad reality, based on observations from animal advocates, is that many bobby calves are NOT:-

- Properly fed before leaving the farm
- Loaded on to transports in a low stress manner and in the appropriate density
- Provided with appropriate bedding or shelter and pick-up points, saleyards, on transports or at slaughter premises
- Provided with protection from climatic extremes and bad weather at any point in the transport process
- Are unlikely to be slaughtered (or fed) upon arrival at slaughterhouses.

5. An increased 'time off feed' fails to recognise that these vulnerable baby animals are unlikely to be provided with feed ('curfewed') for a lengthy period before being transported, which does not appear to be factored in to this proposal, and this would be in addition to further denial of feed at saleyards and slaughterhouses. Full declarations of feed given to these animals (or otherwise) must be provided at all points in this process.

6. Such a proposal clearly opens the way to severe (additional) abuse and cruelty being inflicted on these animals who, as well as being terrified and away from their mothers, may be unable to walk or stand as a result of such periods of deprivation, and observers at saleyards have seen bobby calves being kicked, thrown, dragged, prodded and their tails twisted as their abusers become impatient with their frailty. There is little or no monitoring of the condition of the baby animals on farms, in saleyards, on transports or at slaughterhouses.

7. A 30 hour Time of Feed regime allows for bobby calves to be picked up from more than one property, left at saleyards for longer, and not slaughtered upon arrival at abattoirs. This is clearly an extremely cruel measure that has everything to do with financial gain and absolutely nothing to do with the welfare of the animals. Essentially, it is about implementing an extremely minimal standard in the hope that the animals can still stand long enough to be slaughtered.

8. Australia claims to have the 'highest standards of animal welfare'. The EU Code of Practice provides that 'unweaned animals must be slaughtered immediately, or at least within 2 hours of arriving at abattoirs'; clearly way ahead of this proposal. Often bobby calves are left overnight at slaughter premises, weakening their minimal reserves even further, Australia also transports hundreds of thousands of animals thousands of kilometres every day, purely for financial gain and in all weather extremes, and these transports are almost entirely unmonitored. The sad reality is that Australia should be ashamed of its treatment of 'food' animals. While regulations may be in place, there is little or no monitoring or enforcement of compliance, and it is this that these 'industries' rely upon.

On the basis of the above, it is AACT's view that the Primary Industries Ministerial Council should reject outright any proposal to increase 'time off feed' for bobby calves.

*cc: Bryan Green, Minister for Primary Industries and Water, Tasmania.*

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