

Australian Cattle Veterinarians

Special Interest Group of the Australian Veterinary Association Ltd
ABN: 63 008 852



2 February 2011

Dr Kevin de Witte
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Animal Health Australia
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DEAKIN ACT 2600

Dear Kevin

Re Bobby Calf Time Off Feed Public Consultation

In regard to the matter above, as President of the Australian Cattle Veterinarians a special interest group of the Australian Veterinary Association I would like to respond on behalf of the ACV executive on the proposed amendment to SB4.5 of the Specific requirements for the land transport of cattle, to allow for a maximum permissible time off feed of 30 hours for Bobby Calves.

The ACV recognises that the change from a code of practice (where a prosecution could only occur on the basis of a complaint) to a mandatory standard (where auditable records are required and a prosecution could be made on the basis of these) should be seen as a strengthening of the regulations surrounding the welfare of bobby calves.

The ACV executive has expressed some concern that the suggested 30 hours is not supported by adequate scientific data, though acknowledges that a commissioned, as yet unpublished study supports the 30 hour maximum permissible time off feed recommendation.

In the quoted study there is no comment as to what the environmental conditions were like during the study, either excessively hot or cold conditions may have increased the effects of fasting and/or dehydration. The ACV executive encourages all stakeholders to seek a more thorough data set that also examines the effect of 30 hours off feed across the whole range of climatic conditions experienced by bobby calves in the dairy regions of Australia.

While it is acknowledged as commonplace in the industry for calves to be fed at 24hours feeding intervals, it is our feeling that this is not a relevant comparison in this case. Calves on once a day feeding will have free access to water and generally grain or pellets and it is actually the decline in blood glucose that is a key driver to encourage early intake of pellets or grain which facilitates early weaning (which is the aim of once a day feeding regimes).

The ACV notes that the results of the commissioned study would be unlikely to translate to calves that were transported in ways that do not comply with current guidelines and emphasizes that adherence to all aspects of the guidelines is essential for the maximum 30 hours time off feed recommendation to form a mandatory standard. .

We note that in the process of changing from a code of practice to a standards based approach, a line has to be drawn somewhere, and that a maximum permissible time off feed of 30 hours is supported by the

available data from Australia and New Zealand

ACV notes that our endorsement of the proposed maximum 30 hour time off feed is conditional upon the understanding that the monitoring of compliance with all of the existing standards, and consideration of all issues relating to the land transport of cattle will form an integral part of the mandatory standard. This will help ensure that there is, at all times, an acceptable welfare outcome when bobby calves are being held off feed for up to the maximum permissible time of 30 hours.

We note that when read in context, the mandatory standard would read as outlined below:

Calves must be:

- 1) be protected from cold and heat
- 2) be in good health, alert and able to rise from a lying position
- 3) have been adequately fed milk or milk replacer on the farm within 6 hours of transport
- 4) be prepared and transported to ensure delivery in less than 30 hours from last feed with no more than 12 hours spent on transports
- 5) have an auditable and accessible record system that identifies that the calves were last fed within 6 hours of transport (unless the journey is between rearing properties and is less than 6 hours' duration)
- 6) Under the proposed standard, calves must also have room to lie down on their sternums, and be off water no longer than 18 hours.

In supporting the 30 hours time off feed as outlined in the proposed standard, ACV wishes to emphasize that this is to be the **maximum** permissible time off feed to allow for unexpected contingencies like breakdowns (etc); it should not be seen as the ideal nor be considered routine. The ACV executive believes that calves should be fed at least every 24 hours, but accepts that at times this may not be possible. ACV would encourage further work by industry stakeholders to ensure that the number of calves not slaughtered on the day of pickup is reduced as much as possible or eliminated.

In conclusion, based on the best available data, the ACV executive supports the proposed amendment leading to a 30 hour limit as the maximum permissible time off feed when all co-existing standards and guidelines relating to land transport are in compliance.

Yours faithfully

Robert Bonanno
President
Australian Cattle Veterinarians