



A Submission to

**Bobby Calf TOF RIS Submissions
Animal Health Australia
Suite 15 26-28 Napier Close
DEAKIN ACT 2600**

In response to the public consultation on:

Bobby Calf Time Off Feed Standard

Prepared on behalf of the Australian Dairy Industry

By

Australian Dairy Farmers and Dairy Australia

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This submission has been developed in consultation with Australian Dairy Farmers and Dairy Australia.

The dairy industry is one of Australia's major rural industries. Farm gate production was valued at \$3.4 billion in 2009/10, ranking third behind beef and wheat production. Dairy is also a major export earner for the Australian economy, with approximately half the milk produced being exported to more than 100 countries worldwide.

Australian Dairy Farmers is the national voice of Australia's dairy farmers providing strong leadership and representation for the continued growth of internationally competitive, innovative and sustainable dairy farm businesses. Dairy Australia is the dairy industry-owned service company, limited by guarantee, whose members are farmers and industry bodies, including the Australian Dairy Products Federation and Australian Dairy Farmers.

On behalf of the dairy industry Australian Dairy Farmers and Dairy Australia welcome the opportunity to provide comment on the Bobby Calf Time off Feed Standard.

If you need to clarify any of the points or obtain additional information please contact either of the following:

David Basham
Animal Health and Welfare Advisory Group Chair
Australian Dairy Farmers Limited
Level 2 Swann House
22 Williams Street, Melbourne Victoria 3000
Tel: 0417 865 962
Email: dbasham@bigpond.com

Bridget Peachey
Manager, Animal Welfare Program
Dairy Australia
Level 5 IBM Centre
60 City Road, Southbank Victoria 3006
Tel: 03 9694 3885
Email: bpeachey@dairyaustralia.com.au

INDUSTRY POSITION

The Australian dairy industry **supports** the proposed draft standard amendment (**Option B** in the Regulatory Impact Statement) to SB4.5 of the *Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock* defining a maximum time off feed for bobby calves, that Bobby calves between 5 and 30 days old travelling without mothers must:

“be slaughtered or fed within 30 hours from last feed.”

The Australian dairy industry acknowledges that this option:

- sets an maximum enforceable limit that will adequately manage risks to the calves' welfare.
- is achievable and is consistent with the common once-daily feeding practices of the industry for both sale calves and replacement heifers.
- is science-based and addresses the physiological stresses calves are subjected to during transport.

It is recognised that the proposed standard will provide a limit for time off feed that is legally enforceable. This limit, defined by the standard, does not reflect the actual time that the majority of calves are normally off feed. Australian dairy farmers care about the welfare of all their animals and industry practices are directed towards ensuring calves are prepared, transported and slaughtered within the shortest possible period.

The Regulatory Impact Statement (RIS) concludes that alternative maximum shorter periods of time off feed would impose substantial additional costs at farm gate, but we would draw attention to the failure of the cost/benefit analysis to include impacts beyond the farm gate. The dairy industry believes that the economic implications of the alternative standards need to be given greater prominence in the Regulatory Impact Assessment (RIA). The economic consequences of Options C & D in the RIS (shorter maximum times off feed) are so severe that the entire calf processing industry for dairy calves is likely to be non-viable and to collapse. This will result in significant numbers of calves needing to be humanely slaughtered and disposed of on farm with associated biosecurity, environmental and emotional risks if alternative markets for these animals are unable to be sourced.

As well the processing of bobby calves is undertaken at the same processing establishments as the small animal supply chain - sheep and lambs, enabling economically viable and sustainable year round operations of these abattoirs. To enforce a time off feed for bobby calves of less than 30 hours maximum would impact the on-going viability of the whole small animal supply chain in regions serviced by these abattoirs.

BACKGROUND

The Australian dairy industry developed the National Dairy Industry Animal Welfare Strategy following consultation with key stakeholder groups in 2003. The aim of the strategy is:

“To provide leadership to enhance our record for animal care, ensuring community confidence and market access.”

The dairy industry’s strategy is consistent with the Federal Government’s Australian Animal Welfare Strategy that aims to deliver sustainable improvements in the welfare of all animals with a vision that the welfare of all animals in Australia is promoted and protected by the development and adoption of sound animal welfare standards and practices.

The Australian dairy industry has supported the development of the *Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock* to ensure consistent national implementation of agreed animal welfare standards across all jurisdictions. Our contribution to the drafting of the Bobby Calf Time off Feed Standard as an addition to this document has been directed towards finding achievable solutions throughout the whole bobby calf supply chain for good animal welfare outcomes supported by science and robust animal management practices.

A key priority for the Australian dairy industry is to ensure that all calves are managed across the supply chain according to agreed industry practices and standards. The implementation of a standard for maximum allowable time off feed for bobby calves that is underpinned by science and achievable by industry will support the dairy industry’s commitment to high standards of animal care and is consistent with the dairy industry’s Calf Management Program. The objectives of the Calf Management Program are:

1. All people working across the calf supply chain must deliver on their responsibilities for good calf health and welfare
2. Government and the public can expect high standards from the calf supply chain and have confidence that it is operating responsibly
3. Confirmation that recommended practices are supported by robust science and deliver against community expectations using appropriate industry tools and systems.

The dairy industry recognises that the welfare of bobby calves is important. It is working actively with other members of the bobby calf supply chain to improve the handling of calves and efficiency of transport from farm to slaughter in order to consistently meet current and proposed transport recommendations. It is important that the Standard is achievable and realistic for the bobby calf supply chain. The bobby calf supply chain has been working to minimise travelling time for calves through efficient aggregation arrangements which may be compromised if the maximum time off feed is unnecessarily restrictive.

Support for Proposed Draft Standard Amendment

The Australian dairy industry supports the recommended proposed standards amendment to SB4.5 of the *Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock*. A maximum 30 hours without liquid feed from the time of last feeding until next feed or slaughter of the calf provides a solid foundation for protecting the welfare of calves while being transported.

As well, a significant concern for the dairy industry is the implementation of nationally consistent standards. As is noted in the RIS and supported by industry the proposed maximum 30 hours time off feed standard recognises the practicalities of getting the calves from the farm to the abattoir. Consequently it is more likely to be adopted by most jurisdictions than other options and is therefore likely to promote national consistency and certainty to industry participants right along the supply chain.

Science to support the development of a standard for maximum time off feed for bobby calves

Research conducted in New Zealand in 2000 indicated that bobby calf welfare was not unduly compromised by a time off feed of up to 30 hours (Todd *et al.* 2000). The study measured a range of blood biochemical variables in the calves, and the authors concluded that with correct feeding regimes and transport protocols, welfare compromise in young, healthy calves being transported for up to 12 hours can be minimised when they are slaughtered within 30 hours of the start of transport.

To provide data for Australian conditions Dairy Australia and the Department of Agriculture Fisheries and Forestry commissioned similar research undertaken independently by Dr Andrew Fisher and colleagues from the University of Melbourne and the Animal Welfare Science Centre to inform the development of a science-based maximum time-off-feed (TOF) standard for bobby calves (Fisher *et al.* 2010).

The objectives of the research were to:

- 1) determine the welfare and metabolic state of 5- to 10-day-old dairy calves in response to increasing time off feed- up to 30 hours, in conjunction with three transport scenarios; and
- 2) use these results to provide objective scientific evidence, along with published New Zealand information, to support the Australian development of an appropriate standard for maximum permissible time-off-feed for the bobby calf supply chain.

Outcomes from the research demonstrated that transport was not a significant additional impost on 5- to 10-day-old dairy calves. Based on the data, and the conclusions of the similar New Zealand study, the authors concluded that 30 hours with good practice in other aspects of calf management and transport was suitable as the maximum time off feed limit for bobby calves. Although the Australian research results are yet to be published in a peer reviewed scientific journal it should be highlighted that before acceptance of the final report the work was independently reviewed by an international expert. The reviewer confirmed that the study was well designed and that the conclusions were substantiated.

The recommended standard of 30 hours time off feed is also consistent with normal industry practice of once a day feeding for both sale and replacement calves and it has been shown by research there are no

adverse outcomes on calf health and performance when comparing once and twice a day feeding (Gleeson *et al.* 2007; Stanley *et al.* 2002; Ugur *et al.* 2008).

Comments on the alternative standards and associated RIS

The Australian dairy industry supports the findings of the RIS that “the recommended maximum 30 hour TOF standard is supported by Australian and New Zealand scientific research” and that “This research indicates that the proposed standard is reasonable as an outer ‘legal’ limit for time off feed for bobby calves, when combined with appropriate calf management and transport practices.”

The RIS describes an alternative Option A which is the status quo or no defined standard for maximum time off feed for calves. Although industry would continue to adopt voluntary controls and minimise time off feed this option provides no certainty or transparency and is not supported by the dairy industry.

The RIS also presents alternative options of 24 (Option C) or 18 (Option D) hours time off feed for bobby calves. The costs to the bobby calf supply chain for Options C and D are estimated in the RIS to be \$20 M or \$176 M at farm gate respectively over five years. These are substantial imposts and would have major impacts on the industry with no guarantee that animal welfare outcomes will be improved under either standard.

These above costs include:

- Loss of farm gate value of bobby calf market
- Cost of slaughter and disposal on farm
- Cost of slaughter and disposal at knackery
- Loss of wholesale value of reared calf market
- Cost of enforcement of the standard.

However, they fail to address the environmental and biosecurity implications for carcass disposal of calves that must be slaughtered if they are not able to be transported within the proposed times of the alternative standards, nor do they include the possible substantial economic losses to meat processors and livestock transporters and agents (post farm gate costs).

While it is agreed by industry that most calves are already delivered and slaughtered within a 24 hour time frame a legally enforceable standard with a maximum time off feed of 24 hours would restrict the availability of calves that can be assured to be delivered and slaughtered within this time frame - to such an extent that it will not be commercially viable for most calf processors to remain in business.

As a result a likely scenario for both options C and D is the end of the bobby calf trade which will have a business impact well in excess of that quoted in section 4.5 of the RIS for Option D of \$79 M annually or losses of more than \$326 M over five years.

As is noted above but also not covered adequately in the RIA the end of the bobby calf trade will also impact on the small animal supply chain which often relies on bobby calf processing to supplement sheep and lamb processing. This ensures these processing establishments are economically viable and sustainable year round providing on-going and reliable employment in those regions.

CONCLUSION

The Australian dairy industry supports the adoption of a maximum bobby calf time off feed standard of 30 hours that recognises industry practice of daily feeding of all calves (replacement and sale calves) and does not compromise calf welfare. The proposed standard **is underpinned by science and achievable by industry**. It also promotes **consistent implementation under a national legislative framework**.

Industry recognises that the proposed standard will provide a maximum period for time off feed that is legally enforceable. This outer limit does not reflect the actual time that the majority of calves are normally off feed. Industry practices are directed towards ensuring calves are prepared, transported and slaughtered within the shortest possible period.

The Australian dairy industry has an excellent record of outstanding animal welfare outcomes and prides itself on the care and welfare of all its animals. The implementation of the recommended standard will contribute to achieving harmonisation of legislation in Australia across the bobby calf supply chain.

Australian Dairy Farmers and Dairy Australia urge the Primary Industries Ministerial Council (PIMC) to adopt and incorporate a 30 hour maximum time off feed standard for bobby calves into the *Australian Animal Welfare Standards and Guidelines for Land Transport*.

References

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