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PARLIAMENT OF WESTERN AUSTRALIA
LEGISLATIVE ASSEMBLY

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Bobby Calf TOF RIS Submission
Animal Health Australia
Suite 15
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Dear Sir, Madam,

Bobby Calf TOF RIS Submission

Thank you for the opportunity to comment on the proposed bobby calf time off feed standard (TOF) and the accompanying regulatory impact statement (RIS).

Australian animal welfare regulation must now satisfy a more rigorous social "licence to trade" similar to that recognised for instance, by the mining sector in Australia. Current animal welfare practices for Australian (slaughter destined) bobby calves represent negative externalities of an industry that have not yet been adequately addressed. Therefore, the aim of this review of existing regulations must be to bring the requirement for good welfare practices back into the regulatory sphere.

I am aware that people 'on the ground' in saleyards, animal transports and slaughterhouses have reported that bad practices are common, especially in relation to animals of low financial value. Saleyard managers have complained that they shouldn't have to deal with bobby calf problems; they want regulators to take that responsibility, though they know this is highly unlikely given that most state regulators are woefully under-resourced. Transporters have said that they hate transporting young calves and when they arrive at a saleyard with weak ones they will blame the producer and take no responsibility for the weak state of the calves themselves. Producers have said that they don't want to waste feed on a calf destined for slaughter, and they will complain that it's already costing them about the same amount of money to transport the calf to the saleyard and pay the yard fee as they will sell it for - so there is an absolute resistance to take any extra care of it or pay for vet assistance.

Conditions currently endured include:

- Bobby calves arriving into the saleyard at 10 or 11am because the farmer does not want to get up and feed them at 4 or 5am, and since they are going to slaughter anyway. Given the farmers are reluctant to spend \$ on them - there is every potential that the tiny bobby calves will arrive at saleyards in an already weakened condition.
- Although the calves may be marginally 'fit to load' at the farm, there is every potential that further down the chain the calves' condition deteriorates to the extent whereby they are no longer fit to undertake the rest of the arduous journey through the 'process'. There is no trustworthy system which will ensure the weakened calves are recognised, removed and treated humanely.
- The calves are often loaded into trayback utes and transported great distances to the saleyard. Most times the utes offer no protection for the calves against the elements. Footage of baby calves being pulled or dragged off utes backwards by one leg or pulled on and off trucks by the ears (they have no following behaviour) has been submitted to authorities yet continues. The action by transporters/vendors occurs in part because of the poor condition of ramps at saleyards and because there is a lack of regulatory oversight.
- No bedding is provided for bobby calves. As the small animals are considered of low \$ value, they often get the worst pens and are forced to wait for hours on cold concrete or in the heat for pickup after auction.
- Calves have little physical strength and under-developed following behaviour so it is common for calves to be unable to rise from a sitting or lying position without assistance. Unless the handler is willing to carry them on and off transport they are difficult to handle humanely. Transporters work to deadlines and as such do not have the time to carry the calves on and off a truck therefore the appeal to twist their tails, kick, hit, drag or use electric shock prodders on the calves to get them on and off trucks are there.
- Regulators are under-resourced and unable to monitor the loading, unloading and other handling of bobby calves, so when frustrated producers, transporters or saleyard staff drop, kick, prod, hit, tailtwist or drag them by the ears - there is seldom anyone watching to pull this non compliant handling up, and even when there is someone watching, it is generally accepted in industry circles that bobbies are weak, low value, unwanted animals so 'a blind eye' is turned. Similarly, even bobby calves who were perfectly fit when they left the producer's property are often unfit after long transport and day at a saleyard - and there is nobody to monitor their condition and feed, treat or emergency kill those that become unfit for further sale or transport.

In 2011, the benchmarks for good practice in government consultation are much more rigorous than in the past. This is particularly the case when applied to standards governing the production of food and those that may be deemed to be 'science-based'. In evidence of this and in addition to community concern about the welfare of stock animals, I note the current and ongoing controversy concerning the adoption of GM crops and food labelling in Australia, and indeed, around the world.

Any fair process of stakeholder mapping that your agency would no doubt have completed prior to this review, would have identified that Australian consumers of dairy products are major stakeholders. Consumers require realistic information about the real welfare risks of these proposed changes in order to contribute meaningfully to a consultation process. Real information would include providing consumers with a true picture of the impact of feed deprivation on bobby calves before, during and after transport.

Good government consultations should involve at the very least, advertisements in major newspapers, community newspapers, social media and a method of delivering and collating information so that all key stakeholders are sufficiently well informed to make their response. All information should be free.

In relation to this current review, to ensure a focused response and to improve the quality of information provided to AWSWG, structured open-ended questions that elucidate key issues and invite specific comment should be promoted as available to the public as well as copies of the Welfare Science Review and the Consultation RIS .

In summary, the government is responsible for presenting evidence to the community about the real life welfare risks facing bobby calves before, during and after transport. Without this information, pivotal stakeholders (i.e. consumers), can't properly identify the costs or benefits of any option, and won't be equipped to make informed decisions about which TOF standard, or alternative to a TOF, they will support.

I fully appreciate the preference for pursuing this issue as a 'science based' standard. However, by deciding that this would be a selective consultation that excludes consumers, and then by providing those stakeholders with research demonstrating that under best practice conditions a baby calf can endure starvation for an extreme number of hours before incurring serious damage - is neither realistic or an encouragement to industry to move towards best practice. The economic drive to push the limit of animal endurance to extremes highlights the inconsistency between this 30 hour proposal and the much more precautionary TOF limits set by the E.U., the UK and Canada, which appear to be supported, in principle, by the 'scientific' advice of international animal welfare experts.

In January 2011, UK animal welfare expert, Broom recently wrote that:

'Calves have almost no food reserve at birth so would start to starve rapidly. In most countries it is illegal not to feed young calves and colostrums provision is required for protection against disease. Water provision is also required, in addition to milk in hot conditions (above 25C). The fact that they will be killed does not change this requirement.It would be reasonable not to feed young calves for up to 6 hours but not be reasonable to starve them after that. The suffering would be more and more extreme from 6 to 30 hours. (For more information see D.M.Broom and A.F.Fraser (2007). Domestic Animal Behaviour and Welfare, 4th edn., pp 438. Wallingford: CABI. Paperback ISBN 9781845932879. (see needs of calves and chapter on cattle welfare, starvation)

Outside of economic arguments, as a member of the public, I would like you to know that the research evidence you provide is simply insufficient from any position.

The proposed changes outlined in this TOF and RIS will not stand the test of public scrutiny. In 2011 'science' is NOT an acceptable excuse for cruelty.

The first choice by the dairy industry of Australia should be to opt for on-farm slaughter by an accredited mobile humane slaughterer. However, as this would not always be possible, the very minimum standard should be the preservation of the 10 hour TOF along with absolute support of a mandatory declaration of the last feed for each link in the use chain. This would demonstrate that the industry have included animal welfare into their business decisions.

There are many successful, higher welfare systems in existence around the world now so industry must recognise this option as an opportunity to rebrand and add value to their product.

The RIS claims there is a need for market intervention but fails to provide any details or evidence of this and fails to provide a range of practical, sustainable options that have been subject to reliable value for money assessments, noting that value for money includes a fair assessment of the social, economic and environmental costs associated with the option. This has made it very difficult for me to consider the options presented as valid, reliable or comprehensive.

Finally, in relation to this review of Bobby Calf TOF RIS and based on the arguments above, I make the following submission;

- A standard amendment of 10 hours maximum TOF be adopted. (less than A to D options given)
- That the standard SB4.5 be redrafted to firstly, make it mandatory for the producer to both make a written record of the last liquid feed administered to the calf and pass this onto the transporter (transporter must sign to say it was received). Secondly, to require that each link in animal use chain sign off to say whether bobbies were fit when picked up and fit (or unfit) when received
- Bobby calves destined for slaughter must be humanely slaughtered on farm within first 7 days of life, by a mobile slaughterer, accredited with humane slaughter qualifications.
- Bobby calves not destined for slaughter must be a minimum of 14 days old to transport, and since their ability to withstand heat and cold and stressful transport is limited even at this age - each calf must be given sufficient space on the vehicle to lie down and they must be provided with bedding in transport, at pick up points and in saleyard pens
- 14 day old calves in transport must not be transported more than 8 hours.

I look forward to your response.



Lisa Baker MLA

MEMBER FOR MAYLANDS