

3 February 2011

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

By e-mail: [consultation@animalhealthaustralia.com.au](mailto:consultation@animalhealthaustralia.com.au)

Dear Sir/Madam,

Compassion in World Farming welcomes the proposal to amend the 2008 Land Transport Standards and Guidelines to insert a maximum 'time off feed' (TOF) for 'Bobby' calves. However, we do not support the time limit of 30 hours nominated: **Option B – the proposed standard i.e. 30 hours maximum TOF** as a basis for legislation and enforcement across Australia<sup>1</sup>

Of the three alternatives: Option A – no amendment; Option C – a Standard amendment of 24 hours maximum TOF and Option D – a Standard amendment of 18 hours maximum TOF, Compassion considers Option D to have the best possibility to deliver the best welfare to these very young and vulnerable animals. However, even this we consider too long a period for calves of approx 5 – 10 days to be deprived of sustenance. We do not consider that calves of this age should be subjected to transportation and know that on occasions circumstances will result in some animals being younger than the industry-accepted 5 days. Some are likely to have been induced and will be less physically developed and less likely to cope because of this.

In the RIS is noted that a period of 18 hours TOF would incur additional costs. There is currently little public awareness of the high personal costs to bobby calves associated with the dairy industry and it can be argued that higher costs to the general public and greater returns to the industry would assist these costs. We also anticipate that the lower TOF would necessitate a rearrangement of calf collection arrangements that realistically would cease the overnight keeping of calves in barren and often bitterly cold abattoirs overnight until slaughter the next day. We believe this would be preferable, from an animal welfare point of view, to providing the basis for legal sanction of 30 hours TOF.

Calf TOF is necessarily linked to transportation time. Transportation of very young, in this case 5 – 10 day old calves of more than 100km is not permitted in the EU, and then bedding must be provided. Compassion supports this regulation. As they are destined for immediate slaughter, latent effects upon many transported bobby calves will not be apparent prior to slaughter, although they may appear some time later, should the animals be kept for rearing. This should indicate that animals may suffer a loss of well-being and feel unwell, although clinical signs may not be apparent.

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<sup>1</sup> PIMC Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock. Proposed amendment to the Land Transport of Livestock Standards (SB 4.5) Bobby Calves Time Off Feed Standard Regulatory Impact Statement (RIS) for Public Consultation Edition 1 2010 Version: 1 p.iv