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Department of Primary Industries

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Dear Sir/Madam

BOBBY CALVES - TIME OFF FEED STANDARD

Thank you for the opportunity to comment on the proposed amendment to the Land Transport Standards (LTS) in relation to bobby calf time off feed (ToF) requirements. The following comments are made on behalf of the Victorian Department of Primary Industries (DPI).

DPI Victoria supports the proposed 30 hours maximum ToF period.

It is important, however, that once the LTS is finalised that Animal Health Australia emphasises to stakeholders that this standard is a "whole of chain" standard which will apply to all participants in the supply chain from producer to processor, and not apply solely to the transport part of the chain. It covers the entire period from last feed on farm until a calf is slaughtered or fed. Importantly also, stakeholders need to appreciate that the 30 hour standard will be the outer legal limit of what is allowable.

Please note that standards introduced under Victoria's Livestock Management Act 2010 have a minimum six month implementation phase during which time DPI will work with impacted livestock industries to develop protocols and processes for the implementation and compliance monitoring of each new standard.

DPI's expectation is that industry will monitor compliance with the nationally agreed ToF standard for calves through its formal QA arrangements, and will be able to periodically report on compliance levels through approved arrangements endorsed under Victoria's Livestock Management Act.

Should you require any further clarification on these comments, please contact DPI's Director Animal Biosecurity and Welfare, Dr Tony Britt on (03) 5430 4512.

Yours sincerely

DR HUGH MILLAR
Executive Director Biosecurity Victoria

