



1st February 2011

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

Dear Sir/Madam,

This submission is presented by Lee McCosker on behalf of Humane Choice. Humane Choice is an accreditation body for free range animal production systems.

We wish to address the amendments to the Land Transport of Livestock Standard – Bobby Calves Time Off Feed.

We understand that the Primary Industries Ministerial Council (PIMC) resolved to develop a science based standard for the management of bobby calves to be included in the above transport standard.

The first area of concern that we would like to discuss is the accuracy and the credibility of the science used to base a recommendation of 30 hours time off feed be adopted. The Fisher Report, upon which this recommendation is based, appears to be flawed and somewhat biased.

I shall address our concerns in point form:

- The report is yet unpublished and therefore has not been peer reviewed.
- The study was undertaken at just one location.
- The study only represented a minute portion of the industry. (only 60 calves were used in the entire study)
- The study did not accurately reflect the diverse range of conditions calves are farmed under.
- The study did not take into consideration the varying levels of health that the average very vulnerable bobby calf may experience.
- The study did not take into consideration varying climatic conditions as it was carried out around Spring.
- The study is quoted as saying that a 'normal' feeding ration of milk is 5 litres when this is generally not the norm at all. Industry recommends each heifer replacement calf should drink 4L of milk (or 500g of milk solids) per day, which is equal to about 10.12% of its birth weight.¹ Replacement heifers are far more valuable to the producer so one can only assume that the milk fed to an unwanted bobby calf may be significantly less.

¹ Dairy Australia – Dairy Welfare, Calf Management, Rearing Dairy Heifer Calves

To summarize our concerns about the Fisher Study;

We believe that the study is inadequate and not appropriate to base any recommendations on in regard to allowable times off feed for bobby calves. The study must be published and peer reviewed before it can be used to make such an important decision. One study on its own does not give credible insight into the subject nor do we feel that this study has allowed an unbiased outcome.

This study surmises that 100% of calves will be in a 'healthy' condition and that they will be fed 5 litres of milk per day. How different would the outcome of this study have been if the calves were fed 4 litres per day instead as prescribed by Dairy Australia? I quote this section from the Fisher Report:

In terms of energy status, plasma glucose concentrations were the most altered variable. These increased after feeding, declined slowly for some hours, and then declined more steadily after about 18 h off feed, which is consistent with the expected pattern of a typical daily feeding cycle. Mean glucose at 30 h was close to, but not below published reference values for dairy calves less than 2 weeks of age. A proportion of calves (~12%) were below the lower reference value at this time point, and this proportion was slightly greater than would be assumed by chance.²

The results would have been very different if the calves had been fed the 'normal' amount of 4 litres instead of 5 and it would appear that their plasma glucose concentrations would have declined rapidly after about 18 hours off feed. Even in the unbalanced Fisher Report, a percentage of calves fed the 5 litres of milk were below the lower reference value at this time point.

We therefore refute the claim being made that 'there is no science-based evidence of improvements to bobby calf welfare under 24 hours and 18 hours TOF as compared to 30 hours' and that it is inappropriate that the research be used to set an outer legal limit for time off feed for bobby calves at 30 hours.

Option D

We believe that the available science already points to 18 hours off feed as being the most appropriate option for bobby calves.

It is my own personal experience (after many years of buying bobby calves and rearing them) that it is normal practice, when calves are sold at saleyards, for the farmer to deliver them after milking on the morning of the sale. The calves are usually fed before they leave. It is common practice for calf sales to be held at midday and they are then permitted to be removed from the yards as they are sold to expedite their transport to the abattoir if they have not been purchased to raise as beef. The Draft Consultation documentations confirms that this is a widely accepted practice. (page 25) This does in fact allow the calves to be processed well within the 18 hours time off feed.

Another practice on larger dairy farms is to deliver their calves directly to the abattoir either the night before processing or on the morning of. Again, well within the 18 hours time off feed.

² Dairy Australia - Determining a suitable time off feed for bobby calf transport under Australian conditions

Another common practice, but not mentioned, is the sale of calves directly to other farms for the purpose of being grown on for veal or beef. This practice keeps the time off feed well below 18 hours.

Because of my personal experience in the bobby calf industry, I am concerned that some of the information presented in the draft documentations is a little misleading. For example, there are many calf sales held in dairying regions, especially in coastal areas, and bobby calves are sought after by both processors and producers wishing to grow them on to heavier veal or beef. There are also several domestic abattoirs that process calves on the same, or the morning after livestock sales.

Expected economic costs (Criterion II) seem to be somewhat exaggerated and definitely biased towards Option B to merely allow the continuation of existing industry practice.

A shift in the market structure will probably occur if Option D were to be adopted and producers could well look at other viable options rather than just claiming that thousands of calves will 'become unavailable'. For example, farm gate sales of bobby calves direct to producers enabling the dairy farmer to increase the income he gets from calves and reducing other costs such as transport and agent's fees and even cutting the cost for the dairy beef grower.

Male calves are part and parcel of the dairy industry and a responsibility that cannot just be shirked simply based on cost. No farmer goes into a dairy operation with his eyes shut and the welfare of his animals should be part of his management strategy. The 'emotional cost' of disposing of bobby calves cannot just be measured in dollars and cents to the farmer, today's concerned consumer will want to see the needs of the animals addressed also and we cannot ignore this fact.

We support **Option D** - a standard amendment of 18 hours time off feed for bobby calves.

Yours sincerely,

Lee McCosker