



# HUMANE SOCIETY INTERNATIONAL

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3 February, 2011

To Whom It May Concern:

**Re: Maximum allowable time off feed (TOF) for bobby calves, as prepared by Animal Health Australia (AHA) for the Australian Animal Welfare Standards and Guidelines - Land Transport of Livestock.**

On behalf of our 40,000 supporters, Humane Society International (HSI) appreciates the opportunity to make a submission to Animal Health Australia on the proposed standard amendment to the Land Transport of Livestock Standards (SB4.5) - Bobby Calves Time Off Feed Standard (the Standard).

HSI has strong support for the Regulation Impact Statement's (RIS) recommended **Option D - a standard amendment of 18 hours maximum TOF**. Specifically, that the Standard ensures delivery in less than 18 hours from last feed.

In support of HSI's recommendation, the following points are addressed with reference to the consultation's aims:

- 1. To develop a science-based standard for incorporation into regulations to minimise the risk to the welfare of calves during transport taking into account existing standards endorsed in. The particular area of focus is the maximum time off feed (TOF) a calf can experience before, during and after transport. It proposed that the standard SB4.5 be amended by the addition of the clause "be slaughtered or fed within 30 hours from last feed."*

The Standard states that *there is no science-based evidence of improvements to bobby calf welfare under 24hrs and 18hrs TOF as compared to 30hrs<sup>1</sup>.*

Although Option D (18 hours TOF) claims to be unsupported by scientific evidence, there is no reason not to infer that shorter transport time will in fact improve welfare conditions for calves during transport. As the RIS reports, there have been no studies of welfare conditions of bobby calves under 30 hours TOF. A broader research study must be made to gain complete understanding of the impacts of all the Standard's options.

Research supporting the RIS, as presented in the Fisher Report, is unpublished and industry sponsored, presenting a highly unscientific approach in itself. The report has significant faults in that it is yet to be peer reviewed; was undertaken at just one location; only represented a minute portion of the industry as only 60 calves were used in the entire study; did not accurately reflect the

<sup>1</sup> Primary Industries Ministerial Council (PIMC), 2010, Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock (Proposed Amendment to SB4.5), version 1, P. vii.

diverse range of conditions calves are farmed under; did not take into consideration the varying levels of health that the average very vulnerable bobby calf may experience; failed to take into consideration varying climatic conditions as it was carried out around Spring; and failed to accurately imitate actual feeding conditions, which has the potential to impact results.

Furthermore, as a 30 hour standard is recommended to allow for greater access to saleyards and abattoirs, it can be assumed that distance is a significant factor. Based on this, studies have shown that

*Mortality of bobby calves increased exponentially with distance of transportation to the abattoir... The increased mortality associated with greater distance travelled occurred during transportation rather than after arrival at the abattoir.<sup>2</sup>*

The RIS fails to identify the correlation between distance travelled, time travelled, and impacts on bobby calf welfare.

If AHA is to recommend a scientifically-based standard it must be peer reviewed and published. All options should be supported by relative studies, as was done with the Fisher Report for studying 30 hours TOF, and supported by the government Department of Agriculture, Fisheries and Forestry.

2. To demonstrate the need for the proposed bobby calf time off feed regulation for transport and its associated costs and benefits. (Regulation Impact Statement, RIS)

The RIS states that,

*...a standard of 18 hours TOF would entail substantially higher costs for no observable reduction in the risk to calf welfare.<sup>3</sup>*

However, no scientifically-based studies have actually been made for the case.

The RIS further sets tones of favouring economic viability over animal welfare:

*A 30 hour TOF maximum from last feed to slaughter (in practice 24 hours from farm gate to slaughter) would allow seasonal peaks in calf supply to livestock processing establishments; and longer journeys from isolated regions that do not have meat processing capacity to be accommodated.<sup>4</sup>*

The RIS details more economic assessment for all options than it does in relation to welfare studies, which shows biased reporting. Before a decision can be made, alike studies should be made on the welfare conditions and risks to calves in all options.

Furthermore, the 30 hours TOF recommendation is clearly favoured in the RIS as it provides sufficient time to hold calves in abattoirs overnight without food until they are killed the next day. The economic feasibility studies in the RIS seem to be heavily biased towards maintaining current industry practice without being backed by a thorough scientific assessment of related welfare issues.

Option D - a standard amendment of 18 hours maximum TOF

The Australian Model Code of Practice gives a maximum allowable time off liquid feed or water of 10 hours<sup>5</sup>. Similarly, Australian Veterinary Association policy states that bobby calves should not be transported if the journey will take more than 10 hours to reach the final destination of any of the

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<sup>2</sup> JG CAVE, APL CALLINAN, and WK WOONTON, 2005, Mortalities in bobby calves associated with long distance transport, Australian Veterinary Journal, vol. 83, no. 1-2, p. 82.

<sup>3</sup> PIMC, 2010, p.36

<sup>4</sup> Ibid., p.21

<sup>5</sup> Standing Committee on Agriculture and Resource Management. Land transport of cattle, Australian model code of practice for the welfare of animals, SCARM report no 77, CSIRO publishing, East Melbourne, 1999.

<sup>6</sup> Australian Veterinary Association (AVA), 2009, 8.12 - Off-cow rearing of calves [policy], August, AVA Board, available online at <http://www.ava.com.au/policy/812-cow-rearing-calves>

calves<sup>6</sup>. In comparison, a 30 hour TOF is considerably higher than current welfare policies.

HSI strongly supports the RIS's recommended **Option D - a standard amendment of 18 hours maximum TOF**.

As confirmed in the RIS (page 25), an 18 hour TOF standard has multiple feasible frameworks. With regard to significant increase of costs to industry for Option D, a more thorough and broader economic study must be made to include options which strongly consider the welfare of calves.

In conclusion, a maximum limit of **18 hours TOF** provides sufficient opportunity for bobby calves to be transported to slaughter whilst providing ample time for sales and delivery, and improving current welfare regulations for bobby calves.

HSI appreciates the opportunity to make a submission for the Australian Animal Welfare Standards and Guidelines - Land Transport of Livestock (Maximum allowable TOF for bobby calves).

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Melanie Dulfer-Hyams', with a stylized flourish at the end.

Melanie Dulfer-Hyams  
Humane Society International