

Bobby Calf TOF RIS Submissions  
Animal Health Australia  
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Deakin, ACT 2600

**1 page via e-mail: [consultation@animalhealthaustralia.com.au](mailto:consultation@animalhealthaustralia.com.au)**

To Whom It May Concern,

I'm writing from People for the Ethical Treatment of Animals (PETA) Australia, an affiliate of the world's largest animal rights organisation, PETA US, which has more than 2 million members and supporters around the world. On behalf of our organisation, our members, our supporters and compassionate people worldwide, I am writing to you in opposition to the proposed increase in the number of hours allowed in the Bobby Calf Time Off Feed Standard, which is currently under consideration.

As I'm sure you're aware, under normal circumstances cows would nurse their calves approximately five times per day. Given that calves are known to experience tremendous stress when they are separated from their mothers, denying them food for up to 30 hours would only increase their suffering and discomfort. Even when they are not denied food, calves commonly exhibit stress indicators such as bar biting and sucking on other calves and objects in their pens.

Numerous studies point out the connection between frequent or constant access to food and good calf welfare. A study that appeared in the *Journal of Animal and Veterinary Advances* showed that calf welfare improved when the animals were allowed access to a variety of foods that took them longer to eat, decreasing the time they spent standing idle. Another study found that calves who were allowed constant access to an artificial teat with a steady, low-level flow of milk had reduced instances of cross-sucking – a behaviour that can indicate stress and deprivation. The recommended best practice of New Zealand's Code of Welfare for dairy cattle is that calves should be fed 2 to 7 litres of milk or milk replacer, "preferably divided into not less than two feeds per day".

Increasing the amount of time that calves are allowed to go without feeding would undoubtedly cause the animals a great deal of suffering. In the interest of animal welfare, I hope you will oppose the change.

Thank you for your time and your consideration of this important matter. We look forward to a positive response from you.

Sincerely,

Jason Baker  
Director  
PETA Asia-Pacific