

Bobby Calf TOF RIS Submissions
Animal Health Australia
Suite 15 26-28 Napier Close
DEAKIN ACT 2600
consultation@animalhealthaustralia.com.au

Dear Sir

Re. Bobby Calf Time off Feed Standard

I write to provide comment on the proposed bobby calf time off feed standard and associated Regulatory Impact Statement (RIS). Queensland Dairyfarmers' Organisation (QDO) is the peak industry organisation representing the interests of, and supplying services to, Queensland dairy farmers and the northern dairy industry.

QDO strongly supports the positions presented within the joint submission prepared by Australian Dairy Farmers and Dairy Australia on behalf of the Australian dairy industry. In particular we would like to emphasise our support for the recommended standard, Option B, outlined in the RIS that bobby calves between 5 and 30 days old travelling without mothers must:

"be slaughtered or fed within 30 hours from last feed."

Our dairy farmers care about all their animals and the industry works with producers, transporters and processors to ensure that the preparation, handling and management of all calves that are sent for slaughter meet agreed industry standards for good animal welfare outcomes.

QDO recognises that the proposed standard is intended to provide an outer limit for time off feed that is legally enforceable. This outer limit does not reflect the actual time that the majority of calves are normally off feed. Industry practices are directed towards ensuring calves are prepared, transported and slaughtered within a minimum possible period. However, the recommended standard of 30 hours time off feed is consistent with normal industry practice of once a day feeding for all calves. Furthermore, QDO would also like to acknowledge that this standard is supported by peer reviewed science undertaken in both Australia (Fisher *et al.* 2010 in preparation) and in New Zealand (Todd *et al.* 2000. Research in Veterinary Science 68:125-134) both which concluded that 30 hours was suitable as a maximum time off feed limit for bobby calves.

It is of particular importance to QDO that a realistic and feasible standard is endorsed so that calves that are not required as herd replacements can be sent to viable meat processing enterprises. The rationalisation of bobby calf processors in Queensland has limited the access that our dairy farmers have to local meat processors. The additional impact of an unachievable standard of less than 30 hours maximum time off feed will further reduce the options dairy farmers in this region have for managing their sale calves. This is likely to result in large scale slaughter and disposal of calves on farm with associated social, biosecurity and environmental impacts.

QDO strongly urges the Primary Industries Ministerial Council (PIMC) to adopt and incorporate a 30 hour maximum time off feed standard for bobby calves into the Australian Animal Welfare Standards and Guidelines for Land Transport.

Yours sincerely



Adrian Peake
Chief Executive Officer