

2 February 2011



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Bobby Calf TOF RIS Submissions  
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Dear Sir

**RE: Bobby Calf Time off Feed Standard**

I write to provide comment on the proposed bobby calf time off feed standard. We represent SA dairy farmers of which there are approximately 320 and the majority of our calves are transported to Victoria for processing. Anything less than 30 hours will significantly put at risk the entire calf processing chain here in South Australia due to distance.

The South Australian Dairyfarmers' Association is aware of the joint submission prepared by Australian Dairy Farmers and Dairy Australia on behalf of the Australian dairy industry and strongly supports the position presented within this submission.

In particular we would like to emphasise our support for the recommended standard, Option B, outlined in the Regulatory Impact Statement that bobby calves between 5 and 30 days old travelling without mothers must:

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

We note that this proposed standard (Option B) addresses the issues that gave rise to its development, in that it:

- is science-based and addresses the physiological stresses calves are subjected to during transport,
- sets an enforceable limit that will adequately manage risks to the calves' welfare,
- is achievable and is consistent with the common once-daily feeding practices of bobby calves in the industry; and
- is likely to promote national consistency and certainty to industry participants right along the supply chain.

The recommended standard of 30 hours time off feed is consistent with normal industry practice of once a day feeding for both sale and replacement calves and it has been shown by research there are no adverse outcomes on calf health and performance when comparing once and twice a day feeding.

I would also like to take this opportunity to further emphasise a bobby calf supply chain concern that the cost/benefit analysis excludes impacts beyond the farm gate and to strongly support the dairy industry position that the economic implications of the alternative standards to the bobby calf supply chain need to be given greater prominence in the Regulatory Impact Assessment.

A key priority for the bobby calf supply chain is to ensure that all calves are managed across the supply chain according to agreed industry practices and standards. As a key player we recognise that the welfare of bobby calves is important and work with other members of the bobby calf supply chain to improve the handling of calves and efficiency of transport from farm to slaughter in order to consistently meet current and proposed transport recommendations. It is important that the proposed Standard is achievable and realistic to enable industry to fulfil its legal and ethical obligations while still remaining economically viable.

The South Australian Dairyfarmers' Association strongly supports the 30 hour time off feed and feel this meets the request of the Primary Industry Ministerial Council (PIMC) for a science based standard for time off feed for bobby calves.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "K. Lyons".

Ken Lyons  
CEO SADA