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Bobby Calf TOF RIS Submissions
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Dear Sir or Madam

BOBBY CALVES: PROPOSED TIME OFF FEED STANDARD

Stop Live Exports (formerly known as PACAT) is one of Western Australia's largest animal welfare organisations. Stop Live Exports represents community members who want to reduce the animal suffering in long distance livestock transport.

We do not Support the Current Proposal for 30 Hours Time off Feed

Stop Live Exports does not support the current proposed Standard to allow bobby calves to be held off feed for up to 30 hours (the Proposal). Evidence suggests that the Proposal will lead to poor animal welfare outcomes.

The regulation of bobby calf welfare requires special considerations which may not apply for other types of livestock. Bobby calves are physically vulnerable and are also especially vulnerable to commercial pressures. This means we need to exercise caution when preparing standards for bobby calf welfare.

Evidence suggests that, even under optimum conditions, bobby calves have reached their physical limit at 30 hours time off feed. The Proposal makes no allowance for sub-optimal conditions or the fact that bobby calves are highly variable and particularly vulnerable.

We consider that the maximum legal time limit for bobby calves to be off feed and water ought to be 12 hours. This legal limit will provide a safety margin for bobby calves and ensure positive animal welfare outcomes. It will impose on farmers only the usual requirements for good bobby calf husbandry.

Bobby Calves are a Heterogeneous Population and are Especially Vulnerable

Bobby calves are physically vulnerable. They have poor immune systems, a poor ability to regulate their body temperatures and poor functional reserve. In addition, there is greater variance between bobby calves than for older animals (Mellor¹). This means that there is a greater chance of individual bobby calves being unable to cope with the unexpected vicissitudes of travel and lengthy times off water.

The Proposal is intended to apply to a great variance of bobby calves who come from a great variance of farming practices. For many types of livestock, we can reliably predict how they will cope with variances of temperature, environment and other external stressors. We cannot make the same predictions for bobby calves. This means we need to be cautious when setting a time off feed Standard which will apply to all bobby calves.

Bobby Calves are Especially Vulnerable to Commercial Pressures

Bobby calves are vulnerable also the value of each individual bobby calf is low. This sets bobby calves apart from other types of livestock. For most livestock, there are usually market incentives to ensure that most animals are managed to at least a certain standard.

In the case of bobby calves, there are virtually no market incentives for operators to place importance on the welfare of individual animals. The cost of assuring the welfare of an individual bobby calf could well negate any return from the sale of that animal's carcass.

Calving is a busy time of year for dairy farmers and best practice calf handling can require a disproportionate amount of time compared to other types of animal handling. Busy dairy farmers, transport operators and abattoir workers may find it difficult to manage bobby calves as well as they would wish.

For these reasons, we cannot rely on market forces or usual practice to assure high standards of bobby calf welfare. We must draft a Standard which addresses the special vulnerability of bobby calves.

There is no Rigorous Evidence to Support 30 hours Time off Feed

There is no rigorous evidence to support the suggestion that majority of Australia's bobby calves will cope with 30 hours time off feed. Fisher et al² suggested that 30 hours time off feed might be possible as an outer limit - but only when coupled with best practice animal welfare and enforcement. However, the results of Fisher's small study do not support the authors' suggestion. The results of the study cannot be extrapolated to Australia's annual 800,000 bobby calves.

Fisher's study involved just 60 bobby calves, of an unspecified breed, who all came from the

1 Mellor D Surveillance, 27(4) 2000

2 Andrew Fisher, Peter Mansell, Bronwyn Stevens, Melanie Conley, Ellen Jongman, Mariko Lauber & Sue Hides, Determining a suitable time off feed for bobby calf transport under Australian conditions, Animal Welfare Science Centre, Melbourne

same premises at the same time of year. They were all subjected to similar husbandry and, presumably, were all from the same population. This does not represent a sample of Australian bobby calves.

Fisher's study was performed in controlled conditions in August and September; the most temperate time of year. Cave³ found that August is the month in which the lowest number of bobby calves die in transport in Australia. The standard of bobby calf welfare has been observed to decline as the season progresses⁴ This is possibly due to the time pressures on dairy farmers during the busy times of year⁵ and also because bobby calves do not cope well with extremes of heat or cold (Knowles⁶). As bobby calves are born year round, Fisher's study does not tell us how bobby calves might cope if they are fasted for 30 hours over a very hot summer day or over a very cold winter night.

Fisher's study was conducted on a well-run farm under controlled conditions. Significantly, one calf became sick and 12% of calves were hypoglycaemic at the 30 hour time point. If, even under optimal conditions, around 12% of calves can be expected to hypoglycaemic at the 30 hour time point, the time off feed Proposal is unrealistic. If the Proposal is implemented, we might expect that more than 100,000 bobby calves annually will be subjected to poor welfare outcomes.

Significantly Fisher's study did not measure calf cortisone levels or attempt to measure stress in any other way. We consider that the failure to measure calf stress has been a vital omission in the available data.

The results of Fisher's small study are that, even under optimal conditions, 30 hours time off feed will push all bobby calves to their physical limits and will push a proportion of bobby calves beyond those limits. Consequently, there is no evidence that the Proposal will deliver reasonable animal welfare outcomes.

The Effect of the Proposal within the Context of the Current Bobby Calf Standards

The Proposal must be considered within the context of what is already permitted by the existing Australian Standards for the Land Transport of Animals (the Land Transport Standards).

The Land Transport Standards allow for 5 day old calves, with soft hooves, to be transported

3 Cave JG, Callinan AP, Woonton AP, Mortalities in bobby calves associated with long distance transport, Aust Vet J 2005 Jan-Feb;83(1-2):82-4.

4 Stafford KJ, Mellor D.J, Todd SE, Gregory NG, Bruce RA., Ward RN. The physical state and plasma biochemical profile of young calves on arrival at a slaughter plant New Zealand Veterinary Journal Vol 49 N 4, 1 Aug 2001 , pp. 142-149(8)

5 *ibid*

6 [TG Knowles](#), [SN Brown](#), [JE Edwards](#), A J Phillips, PD Warriss Effect on young calves of a one-hour feeding stop during a 19-hour road journey *Veterinary Record* 1999;144:687-692doi:10.1136/vr.144.25.687

in extreme temperatures without bedding or shelter and then subjected to the stress of consignment through saleyards. This is not best practice animal welfare but it is permitted by the Land Transport Standards. The additional impost of 30 hours time off feed can reasonably be expected to lead to poor animal welfare for some calves.

Pursuant to the Land Transport Standards, neither domestic abattoirs nor trucks carrying bobby calves are required to carry emergency liquid feed for bobby calves. This is a serious problem for animal welfare because the Proposal envisages pushing bobby calves to their physical limits. If any delay occurs during bobby calf transport or lairage, there may be no easy way to alleviate the calves' suffering.

Policy Reasons for a Safe Buffer on the Outer Limit for Time off Feed

We can expect that some dairy farmers will plan journeys so that they can take advantage of the legal maximum. Journeys do not always run to schedule and it is inevitable that some bobby calves will be kept off food and water for much longer than the intended 30 hours.

Fisher's small study suggests that, even under optimal conditions, bobby calves do not always cope with 30 hours time off feed. A better solution is for the time off feed Standard to be far less than 30 hours so that dairy farmers do not intentionally plan journeys that we know will push bobby calves to their physical limits.

Our Proposal for 12 hours Time off Feed

We propose that the maximum time off feed for bobby calves be 12 hours. A 12 hour time limit is in keeping with usual dairy farm practice of twice-daily calf feeds so it is not an additional impost on industry.

In addition we propose that:

- 1. All abattoirs (not just export abattoirs) be required by the Standards to carry emergency liquid feed for bobby calves.**
- 2. All trucks carrying bobby calves to be required by the Standards to carry emergency liquid feed for bobby calves.**
- 3. Abattoirs be required by the Standards to kill bobby calves as soon as practicable after they arrive at the abattoir and not leave them overnight.** This means that workers may be required to work outside normal hours. This small logistical change will easily reduce the time off feed for bobby calves.

Further Solutions to be Explored

A 12 hour time limit necessarily means that transport and lairage must be very short. We appreciate that a 12 hour time limit means that some dairy farming areas will require assistance in finding solutions.

Some solutions which have not been explored in the RIS are:

1. The possibility for bobby calves to be killed by mobile abattoirs; thus removing the requirement for any transport at all.
2. The possibility for government support to increase the number of smaller abattoirs around Australia. A larger number of smaller abattoirs around Australia would reduce many of the animal welfare problems associated with long distance transport.

Yours faithfully

Heidi Nore
Stop Live Exports