



A Submission to

Animal Health Australia

and the Department of Agriculture, Fisheries and Forestry

Animal Welfare Standards Public Consultation

PO Box 196

Dickson ACT 2602

In response to the public consultation on:

Australian Animal Welfare Standards and Guidelines for the Land

Transport of Livestock

Prepared on behalf of the Australian Dairy Industry

By

Australian Dairy Farmers and Dairy Australia

May 2008

This submission has been developed in consultation with Dairy Australia and Australian Dairy Farmers.

The dairy industry is one of Australia's major rural industries. Farm gate production was valued at \$3.2 billion in 2006/07, ranking third behind beef and wheat production. Dairy is also a major export earner for the Australian economy, with approximately half the milk produced being exported to more than 100 countries worldwide.

Australian Dairy Farmers is the national voice of Australia's dairy farmers providing strong leadership and representation for the continued growth of internationally competitive, innovative and sustainable dairy farm businesses. Dairy Australia is the dairy industry-owned service company, limited by guarantee, whose members are farmers and industry bodies, including the Australian Dairy Products Federations and Australia Dairy Farmers.

On behalf of the dairy industry Australian Dairy Farmers and Dairy Australia welcome the opportunity to provide comment on the Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock.

If you need to clarify any of the points or obtain additional information please contact either of the following:

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INTRODUCTION

The Australian dairy industry developed the National Dairy Industry Animal Welfare Strategy (NDIAWS) in consultation with key stakeholder groups in 2003. The aim of the strategy is:

“That the Australian dairy industry has a good reputation in animal care to secure, maintain and enhance the future sustainability of the dairy industry.”

The NDIAWS supports the Australian Animal Welfare Strategy (AAWS) which was developed by the Federal Government with the vision that “the welfare of all animals in Australia is promoted and protected by the adoption of sound animal welfare standards and practices”.

The Australian dairy industry supports the development of Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock for consistent implementation in a national legislative framework.

The Australian dairy industry contribution to the drafting of the Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock (Standards and Guidelines) has been directed towards finding achievable solutions throughout the whole supply chain for good animal welfare outcomes supported by robust animal management practices. The draft Standards and Guidelines have been developed with understanding and contribution from a wide sector of interested parties. This has resulted in some compromises which the dairy industry supports. The dairy industry would only support changes to the draft Standards and Guidelines if there is an opportunity for further input and that any changes are scientifically sound, not excessively prescriptive and are proportionate to the animal welfare concern.

The dairy industry supports the proposed draft Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock (Option B in the Regulatory Impact Statement) subject to resolution of the specific issues that are outlined in the following comments. However, the dairy industry would **not** support adoption of option B1 - which has a variation to Standard SB4 changing the minimum age for transport of calves for slaughter (other than to a calf rearing facility) to 8 days rather than 5 days. The minimum age of calves going to slaughter or saleyards is discussed below in the specific comments.

GENERAL COMMENTS

National consistency in legislation and implementation of the Standards

It was established at commencement of the review and reformatting of the national codes of practice for the welfare of animals that there would be an agreement on national harmony for legislation of these Standards. As this is an important requirement for the standards writing process the dairy industry continues to support the development of a Deed of Understanding or similar binding commitment between all states, territories and Federal Government as to national consistency in legislation of the Standards.

The dairy industry is also concerned that even though the interpretation of Standards and Guidelines has been clarified in the document there are still widely differing views within the parties involved in the process on the position of the Guidelines in legislation. The dairy industry does not support a process whereby the Guidelines are referred to or legislated within state or territory legislation.

Interpretation of Standards and Guidelines

The dairy industry supports the interpretation of Standards and of Guidelines as is outlined in the introduction to the Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock. It is recognised that the Guidelines that are presented in the document are not necessarily complete and are only examples of some of the recommended practices people can use to achieve desired outcomes for good animal welfare during land transport as defined in the Standards. The dairy industry supports the statement that non compliance with one or more of the Guidelines will not in itself constitute an offence under law.

SPECIFIC COMMENTS

PART A GENERAL STANDARDS AND GUIDELINES FOR THE TRANSPORT OF LIVESTOCK

1. Responsibilities and Planning

SA1.1 Duty of Care

The requirement of duty of care is valuable as it outlines the responsibilities for livestock for each person in the transport chain. However, it is important to consider the potential implications of these requirements when compared to existing duty of care requirements in state/territory legislation.

“Duty of Care” is a legal term that is used in state/territory animal welfare legislation to describe who has responsibility for an animal. There is concern that, without adequate assurances from the states regarding national consistency in legislation, the interpretation of the various duty of care statements will potentially differ. This will result in added confusion for producers and transporters as to their responsibility for the animals being transported.

The dairy industry recommends that an absolute commitment to national consistency between states for legislation of the Standards be made as soon as possible.

2. Stock handling competency

The dairy industry supports Standard SA2.1 which is comprehensive and focused on achieving good animal welfare outcomes. It is appropriate for the elements and evidence of competency that may be relevant are detailed in the Guidelines as presented in the draft Standards and Guidelines.

3. Transport vehicles and facilities for livestock SA3.1

The dairy industry supports Standard SA3.1 as presented.

4. Pre-transport selection of livestock SA4.1-SA4.4

The dairy industry is concerned that the draft Standard does not provide for the relocation of animals that require treatment, shelter or extra care and supervision unless veterinary advice is obtained. We recommend that an additional sub-point be added to SA4.1 as follows:

SA4.1 vii) for a limited distance to allow treatment or effective management.

5. Loading, transporting and unloading livestock SA5.1- SA5.15

The dairy industry supports Standards SA5.1 – SA5.15 as presented.

6. Humane destruction

As presented in the draft Standard SA6.7 the term specified newborn livestock is not defined. It is suggested that a Note with reference to Part B of the Standards and Guidelines be included for clarification or that the Standard be amended as follows:

SA6.7 Blunt trauma to the brain must only be used on ~~specified~~ newborn livestock less than 24 hours old **as specified in Part B on the Standards and Guidelines...**

The dairy industry supports Standards SA6.1 – SA6.6 and SA6.8 – SA6.9 as presented.

PART B SPECIES STANDARDS AND GUIDELINES FOR THE TRANSPORT OF LIVESTOCK

B4 Specific requirements for the land transport of cattle

Minimum age for transport of calves for slaughter (other than to a calf rearing facility)

The Regulatory Impact Statement (RIS) includes Option B1 which varies from Standard SB4 by changing the minimum age for transport of calves for slaughter (other than to a calf rearing facility) to 8 days rather than 5 days.

The costs to the bobby calf industry of Option B1, as identified in the RIS, of an additional \$60 million over five years are substantial and likely to have major impacts on the industry with no guarantee that animal welfare outcomes will be improved. The first week of rearing is a critical period for development and changes to the digestive system with consequential animal health risks. Whilst they may be larger and easier to drive, calves of eight to ten days of age are more susceptible to gastro-intestinal illness and infections.

In addition, the dairy industry is concerned that the RIS does not adequately address the full costs to the industry should there be a requirement for farmers to retain calves until they are at least 8 days of age before sending them to slaughter compared to the 5 days of age requirement as is current practice. These include; the extra capital infrastructure required on farm; additional costs of losses of calves due to disease; and potential costs as a result of occupational health and safety issues for handlers. In addition, it is expected that there will be an increase in the number of calves which will be destroyed on farm increasing environmental and biosecurity implications for carcase disposal.

SB4.1 Time off water

The dairy industry is concerned with the provisions for calves 5 – 30 days old travelling without mothers.

The requirement of a prescribed maximum time off water is not relevant as this Class principally covers bobby calves whose diet is exclusively milk or milk replacer. It is recommended that the term “calf feed” which is defined in the glossary, be included in parenthesis adjacent to the maximum time off water specified for this class under Standard SB4.1. Alternatively the provision for calves 5 – 30 days old travelling without mothers should be deleted from SB4.1 because it is redundant given it is repeated in SB4.5 ii).

The maximum time off water (calf feed) of 18 hours is not consistent with common and acceptable industry practice that calves are fed once daily (i.e. maximum interval between feeds of 24 hours). Industry recommendations for feed management of calves on farm includes feeding calves of this age once daily and experience has shown that there are no

adverse animal welfare outcomes for these calves. It should also be noted that the Victorian code of accepted farming practice for the welfare of cattle also provides that calves should be fed at least once every 24 hours. This provision is also supported by research studies on the effects of food withdrawal and transport on 5- to 10- day old calves which found no detrimental effects after 30 hours on the metabolism of healthy and clinically normal calves (Todd *et al.* 2000. *Res Vet Sci* 68: 125-134.). It is recommended that the maximum time off water (calf feed) for calves 5 – 30 days old travelling without mothers be changed to 24 hours (similar change is also recommended for SB4.5 ii).

The dairy industry recognises that the welfare of bobby calves is important and is working actively with other members of the bobby calf supply chain to improve the handling and efficiency of transport from farm to slaughter in order to consistently meet current transport recommendations. It is important that the proposed Standards and Guidelines are achievable and realistic for the bobby calf supply chain. The bobby calf supply chain has been working to minimise travelling time through efficient aggregation arrangements which may be compromised if the maximum time off feed is unnecessarily restrictive. Decreasing the maximum time off water (calf feed) to 18 hours would have a huge impact on the bobby calf supply chain that is not adequately covered in the RIS.

SB4.4 Calves less than 5 days

This Standard provides for very young calves (less than five days) for transport exclusively for rearing unlike the provisions for calves between 5 and 30 days old which includes transport to saleyards and for slaughter. It is important that the arrangements for transporting very young calves to dedicated calf rearers is retained to maximise animal management practices and animal welfare outcomes.

It is appropriate that this Standard includes more detailed requirements due to the vulnerability of these very young calves.

SB4.5 Calves between 5 and 30 days

SB4.5 ii)

SB4.5 ii) is redundant if SB4.1 above remains and should be deleted (see comments SB4.1 above).

If SB4.5 ii) is retained then the dairy industry recommends that the maximum time off water for calves between 5 and 30 days old travelling without mothers is increased from 18 hours to 24 hours since last feed (see comments SB4.1 above).

SB4.5 iii)

The dairy industry does not support SB4.5 iii) because as it is currently drafted an auditable and accessible record will not contribute to improved animal welfare outcomes as it is unlikely to be available to all participants in the bobby calf supply chain. Current Codes of Practice require calves to be fed within six hours of collection for transport. In this situation calf transporters can confidently manage on-going duty of care of the calf during subsequent transactions and transport to ensure that the maximum time off water (calf feed) is not exceeded.

The dairy industry recommends that this Standard SB4.5 ii) be deleted and replaced with the following:

SB4.5 ii) be fed on the farm within 6 hours of transport.

Comments on Guidelines for B4 Specific requirements for the land transport of cattle

Guidelines are recommended practice and are intended to complement the Standards. The dairy industry is not supportive of the use of Guidelines that are more prescriptive than the Standards without adequate science to support them.

GB4.3 Transport time and distance for calves between 5 and 30 days of age

It is recommended that GB4.3 be deleted and replaced with the following:

GB4.3 Calves should be transported for the shortest time possible. Efficient aggregation practices for calves between 5 and 30 days should be used to reduce journey time to final destination. Direct marketing should be used when possible. Calves should not be consigned through saleyards that do not have holding facilities suitable for calves. Where possible, calves should be sent to the nearest available, operating, livestock-processing establishment.

GB4.4 Calves between 5 and 30 days of age

It is recommended that GB4.4 be deleted. The dairy industry does not support GB4.4 as the state of navel cords and hooves are only two of several imprecise indicators of age. In addition, the recommendation that calves should not travel until they are 8 days old for journeys approaching 24 hours conflicts with SB4.5 and would cause confusion.

GB4.7 Transport of pregnant animals

The dairy industry recognises that special provisions are required for the transport of pregnant cows and supports GB4.7 because animals are frequently transported close to parturition to allow closer supervision of calving.

GB4.9 Calves between 5 and 30 days of age

It is recommended that GB4.9 be deleted. As was discussed in the comments for SB4.1 current industry practice, Codes of Practice and research findings recognise that there is no need to feed calves more than once daily and accordingly the dairy industry does not support inclusion of GB4.9.

GB4.10 Loading Density

Loading density is a useful tool to provide guidance on the space allowances for animals during transport. However, basing loading density on liveweight does not take into consideration the range of factors that contribute to animal comfort and well-being during transport and it is appropriate that it is not mandated as a Standard.

The space allowances for livestock 30-200 kg liveweight are not included in the table. This section needs to be completed. If this is not possible it is recommended that the rows be deleted from the table. The dairy industry recommends that no changes to this table be adopted without consideration of the affected parties such as members of the Standards Reference Group.

GB4.14 Ramps

The dairy industry supports the first sentence of GB4.14 but recommends that the second sentence defining ramp angles is unnecessarily prescriptive and recommends it be deleted.

GB4.15 Delivery time

The dairy industry recommends that GB4.15 be deleted. These provisions are not consistent with the comments of SB4 and inclusion of a range of different times from the Standard leads to confusion and are not justified.