



1<sup>st</sup> February 2011

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

Dear Sir,

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

The Tasmanian Farmers and Graziers Association (TFGA) is the peak lobby group representing farmers in Tasmania. The Tasmanian dairy industry accounts for approximately 24% of Tasmania's agricultural production value. With an annual production of around 650 million litres Tasmania accounts for over 7% of the national dairy production.

The TFGA supports the joint Australian Dairy Farmers/Dairy Australia submission. In particular the TFGA supports the draft amendment (Option B in the Regulatory Impact Statement) to SB4.5 of the *Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock* that calves between 5 and 30 days old travelling without mothers must "be slaughtered or fed within 30 hours from last feed".

The proposed standard (Option B) addresses a number of issues in that it:

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

The TFGA acknowledges that the proposed standard will provide an outer limit for time off feed that is legally enforceable. We feel it is important to point out that this outer limit does not reflect the actual time that the majority of calves are off feed.

The standard imposed will have implications right along the supply chain. The TFGA believes that the RIS does not adequately address the economic consequences beyond the farm gate of lower maximum times off feed (Options C and D). These options would be unworkable for the supply chain to achieve compliance.

To ensure that industry is able to fulfil its legal and ethical obligations while remaining economically viable the standard must be realistic and achievable.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jan Davis', with a circular flourish at the start and a horizontal line extending to the right.

Jan Davis

Chief Executive Officer