



January 28, 2011

Bobby Calf TOF RIS Submissions
Animal Health Australia
Suite 15 26-28 Napier Close
DEAKIN ACT 2600

Via email to: consultation@animalhealthaustralia.com.au

Dear Sir/Madam,

The Western Australian Farmers Federation (Inc) (WAFarmers) thanks you for the opportunity to make a submission to the 'Bobby Calf Time Off Feed Regulation Impact Statement' consultation process.

The Western Australian Farmers Federation (Inc.) (WAFarmers) is the State's largest and most influential rural lobby and service organisation. WAFarmers represents approximately 4,000 Western Australian farmers from a range of primary industries including grain growers, meat and wool producers, horticulturalists, dairy farmers, pastoralists, commercial egg producers and beekeepers.

The Western Australian Farmers Federation (Inc) (WAFarmers) supports the scientifically based RIS recommendation of a maximum TOF of 30hrs in the interests of animal welfare standards and operational efficiencies for dairy and cattle farmers.

Western Australia currently has no market for the supply of bobby calves and as such, transport of very young dairy cattle occurs only for short periods of time during inter-property or inter-farmer transit.

WAFarmers recognizes the potential of a slaughter market for bobby calves to become available within Western Australia and as such endorses the scientifically proven maximum Time Off Feed and nationally recognized guidelines for the transport and handling of bobby calves with the following qualification.

As the representative body for both farmers and pastoralists, WAFarmers is concerned by the maximum 12hr transport limit in the standard and the limitations that the 12hr time period would have upon pastoralists transporting young calves, an exercise that is predominately undertaken in order to remove calves from drought affected areas. WAFarmers feels that the enforcement of a 12 hour maximum transit period would unfairly discriminate against pastoralists with the legitimate necessity for extended journeys.

The RIS does not adequately address the logistical challenges of long distance transport and fails to give consideration to the additional physiological strain that could be inflicted upon bobby calves through multiple loadings and unloading.

WAFarmers recognizes the importance of balancing animal health and welfare with the economic and logistical feasibility of the dairy and cattle industries and as such fully endorse the proposed maximum Time Off Feed, however would strongly recommend that due consideration be given to the transport requirements of pastoralists who need to transport bobby calves extensive distances due to geographic isolation.

Finally, WAFarmers thanks you for your consideration of this submission. Should you wish to discuss this matter please do not hesitate to contact me or WAFarmers Director of Policy, Alan Hill on 9486 2100.

Yours sincerely

A handwritten signature in black ink, appearing to read "Mike Norton", with a long horizontal flourish extending to the right.

Mike Norton
President