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A Submission to

Bobby Calf TOF RIS Submissions

Animal Health Australia

Suite 15 26-28 Napier Close

DEAKIN ACT 2600

Bobby Calf Time Off Feed Standard

Prepared by the United Dairyfarmers of Victoria

February 2011

The UDV

The United Dairyfarmers of Victoria (UDV), the dairy commodity of the Victorian Farmers Federation (VFF), is the collective voice of Victorian dairy farmers. We represent members' interests with governments and industries that create policy which impacts upon Victorian dairy farm businesses.

UDV is also the largest member of Australian Dairy Farmers (ADF). Through these state and national linkages we provide our members with the opportunity for representation at both state and national level on issues affecting all farmers.

Our members are part of a vibrant network of branches and district councils throughout Victoria, which directly set the policy agenda for the dairy industry.

The UDV has a proud 35-year history of working constructively with government and industry to achieve positive outcomes for all dairy farmers.

The Victorian dairy industry

The dairy industry in Victoria accounts for approximately two thirds of all milk produced in Australia.

The industry has been through a massive restructure process in recent years to remain competitive in markets distorted by massive government subsidies in world markets.

There are fewer Victorian dairy farmers and fewer cows today compared to ten years ago. Milk production, however, is lower only because the impact of drought and issues regarding the availability of reliable supplies of irrigated water. That is, today's Victorian dairy farmer continues to achieve efficiency improvements in order to remain internationally competitive.

Dairy farms operate within the frame work of a range of regulations. Milk is measured and assessed daily to ensure levels of quality and safety that processors can confidently convert into a wide range of fresh and manufactured milk products. Irrigated and stock and domestic water is regulated with strict usage conditions, the use of chemicals is licensed and animal effluent managed within the requirements of a regulator.

The industry has also been active in the ongoing development of a range of animal health, nutrition and welfare measures as well as animal transportation developments. The industry also has a proud animal husbandry record that it continues to nurture and develop.

The UDV position

The UDV is fully supportive of the submission submitted by the ADF and Dairy Australia.

The Australian dairy industry supports the proposed draft standard 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* defining a maximum time off feed for bobby calves, that Bobby calves between 5 and 30 days old travelling without mothers must:

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

The Australian dairy industry also agrees, as is outlined in the Regulatory Impact Statement (RIS), that this option:

- is science-based and addresses the physiological stresses calves are subjected to during transport.
- sets an 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 the industry for both sale calves and replacement heifers.

The UDV also notes the failure of the cost/benefit analysis to include impacts beyond the farm gate and observe what appears to be a lack of understanding of bobby calf processing . The options (C&D) of shorter time off feed may result in changes to on farm practices with the resultant impact on the viability of the existing bobby calf markets.

Victorian dairy farmers understand that the welfare of bobby calves is important. The UDV has been active in working to improve the handling of calves and efficiency of transport from farm to slaughter in order to consistently meet current and proposed transport recommendations.

The proposed Standard provides an achievable and realistic approach to this issue. It is important that this approach is adopted and continues to build on the work within the industry of recent years. The dairy industry already works to minimise the time between the farm and the abattoir.

The Alternatives

The UDV notes the ADF/DA submission with the costs of Option C and Option D. These costs are additional and constitute a significant increase loss to farmers, plus increase slaughter and enforcement costs, yet provide no guarantee that bobby calf welfare will be improved.

Options C and D are poor alternatives compared with Option B.

In Summary

The UDV supports Option B in the Regulatory Impact Statement to SB4.5 of the *Australian Animal Welfare Standards and Guidelines for the Land Transport of Livestock* defining a maximum time off feed for bobby calves, that Bobby calves between 5 and 30 days old travelling without mothers must “*be slaughtered or fed within 30 hours from last feed.*”

The UDV notes that this position is supported by scientific studies.

The UDV also notes that current industry practice is within this time period. This provides a basis for the industry behaviour to be monitored and measured within an existing bobby calf processing network.

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