

# DISCUSSION PAPER

## Sustainability Framework Review

### Goal 7 Provide best care for animals for whole of life

2 December 2022

Prepared on behalf of the Goal 7 Sub-committee by Stephanie Bullen\*, Sarah Bolton and Jo Coombe.

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## Background

The Australian Dairy Sustainability Framework has included the care of dairy animals as a key priority since its inception in 2013. The Framework acts to communicate progress by the broader dairy industry on issues of key importance to buyers and consumers of Australian dairy products.

Sub-committees of the Australian Dairy Sustainability Framework Steering Committee (ADSF SSC) were set up to review the goals, targets, indicators, and metrics for each of the Sustainability Framework's four Commitments. Following discussion of the recommendations from each Sub-committee at the Steering Committee meeting, 2 March 2021, it was proposed that several Working Groups be established, reporting to the Sub-committees. The Working Groups were made up of industry representatives and subject matter experts (SMEs) to address relevant Goal(s) and/or Target(s), Indicators and Metrics.

The Goal 7 Sub-committee was led by Simone Jolliffe (ADSF SSC), and members included Sarah Bolton (SME), Stephanie Bullen (SME), Lucy Collins (Fonterra), Melina Tensen (RSPCA Australia), Chris Griffin (ADISF SC), Andrew Aldridge (Australian Dairy Farmers), Justin Toohey (Australian Dairy Farmers), Kari Moffar (Austrex), Steve Oldridge (ADPF/Lactalis), Janine Waller (ADPF), Mark Patterson (Currie Communications), Patten Bridge (Bridge Logic), Helen Dornom (Dairy Australia) and Gemma Chuck (Australian Veterinary Association/Australian Cattle Veterinarians). Louise Sundermann (SME), Brian Tessmann (Australian Dairy Farmers), and Corrie Goodwin (Fonterra) were involved in early meetings but were replaced by alternative representatives of their organisation at subsequent meetings.

The Working Group met three times to:

1. Review and refine the language and ambition for the goals and targets, considering the Sub-committee's recommendations, emerging trends, and strategic priorities
2. Review the Australian Dairy Plan and align the Framework with it
3. Decide if the goal(s) and targets are *ambitious* enough for 2025 and 2030?
4. Decide if indicators and metrics are *credible* and *useful* for reporting?

These objectives were largely achieved. The key outcomes from the Goal 7 Working Group meetings were:

- A need to be more aspirational; current indicators are compliance-based and are expected by customers to have already been adopted as minimum standard
- Universal agreement that the industry needs to move towards third party assessment of animal care rather than current self-reporting mechanisms (e.g., triennial Dairy Australia Animal Husbandry and Genetics Survey)
- Targets need to be action driven or demonstrable

- There was a desire to maintain reference to the Australian Animal Welfare Standards and Guidelines despite acknowledgement that these were outdated and in some states the Standards had not been legislated
- There was mixed feedback regarding a 'shopping list' of practices (e.g., no tail docking, no calving induction, management of sale calves etc)
- There was a need to update the list of practices to reflect current and future animal care priorities such as those around painful procedures, surplus calves, and cow longevity
- The existing target around antimicrobial stewardship was appropriate but the indicators needed to be reviewed to ensure they are more aspirational and measurable.

This feedback, together with the findings of the 2019/2020 Materiality Assessment and subsequent additional input from some WG members and the Australian Milk Quality Steering Group were used to develop the proposed targets and indicators outlined below and presented for feedback and further discussion.

### ***2019/2020 Materiality Assessment***

The 2019/20 assessment defined materiality according to two dimensions:

- Significance of the industry's economic, environmental, and social impacts
- Significance to and influence on stakeholder assessments and decisions.

The material sustainability topics identified were assessed and prioritised according to these two dimensions with the results used to develop a materiality matrix and rank topics according to important, material or highly material. In terms of animal care, the topics that ranked highly material included:

- Farm biosecurity
- Animal Care
- Animal Husbandry
- Calves, including bobby calves

See material issues section to access a copy of the Materiality Assessment Report: [Australian Dairy Sustainability Framework - Dairy Australia](#)

### ***Additional recommendations***

Additional recommendations to the Working Group following the first meeting, as to the priority issues from the members, included:

- Pain mitigation, such as the uptake of polled genetics, use of pain relief for surgical procedures and other painful animal health conditions and an end to non-essential husbandry practices such as tail docking and calving induction.
- Reduction of bobby calves sent to slaughter, through the uptake of sexed and beef semen.
- Positive affective states, such as provision of access to pasture by choice, maintaining cow-calf contact, calf rearing practices, cow-longevity, heat stress management, nutritional management, and prevention of disease such as lameness and mastitis.
- The development of a third party, on-farm animal care assessment/monitoring tool.
- Non-replacement calves, pain management, cow longevity and lameness.
- Concerns around the optics of progress against targets in the Australian Dairy Sustainability Reports being reported on triennially (and listed as 'not measured in 2020' for example) due to the frequency of Dairy Australia's farmer surveys.
- Existing 2030 targets being out of step with community and industry expectations (e.g., cessation of tail docking, calving induction).

## **Australian Milk Quality Steering Group**

The Australian Milk Quality Steering Group (aka Dairy Moving Forward Milk Quality Community of Interest) proposed a selective antibiotic dry cow therapy Indicator for Target 7.4., designed to be more measurable and encourage a move away from the use of antimicrobials prophylactically (i.e., preventatively).

## **Proposed changes to Targets and Indicators**

### **7.1. An Australian Dairy Industry Animal Care Assessment Program is developed**

Several of Australia's international dairying counterparts rely on assurance programs and farm level animal welfare assessments to provide robust information on standards of animal care. Such programs include Red Tractor in the UK, the US FARM program, Welfare Quality in Europe, and ProAction in Canada. An equivalent industry or national level program does not currently exist in Australia. In addition, Australian commercial stakeholders are increasingly being influenced by global rating agencies such as the Business Benchmark on Farm Animal Welfare (BBFAW) which assesses companies based on their ability to demonstrate certain standards of animal care and provide evidence of continuous improvement outlined in the companies' publicly available information. At the same time, Australia's ranking on the International Animal Protection Index has slipped from 'B' to 'D' (on an 'A' to 'G' scale), because of the Australian Government decision not to renew the Australian Animal Welfare Strategy, a perceived lack of national coordination on animal welfare policy formulation and implementation and lack of overt recognition of 'sentience'.

In the face of these challenges, there is risk of an ad-hoc approach to increased verification of dairy animal welfare in Australia driven by individual commercial initiatives which is likely to lead to inefficiencies in data collection and reporting and/or inconsistent requirements for standards of care at farm level. It also risks requirements being imposed that fail to acknowledge how Australian dairy farms are currently performing, the achievements made to date, and the year-on-year continuous improvements being made on farm.

To ensure the ongoing competitiveness of the Australian dairy industry, it is recommended that an Australian Dairy Industry Animal Care Assessment Program is developed. It is likely that this would be voluntary at a processor level, incorporate relevant Animal Welfare Standards and Guidelines and industry policies (+/- BBFAW criteria), have its own mechanism for regular review, capacity for self and/or third-party assessment and provide for graded benchmarking and assessment of continuous improvement. This would seek to provide, at the very least, a baseline minimum standard of care for Australian dairy animals.

To understand what an Australian dairy industry program on animal care assurance could look like, Australian Dairy Products Federation (ADPF) has recently funded a scoping project that is currently in progress. ACER Consulting, an animal health and welfare consulting firm with subject matter expertise in animal care assurance programs, has been engaged to provide an overview of what programs are currently in place internationally and within Australia and any key issues for the dairy industry to consider. This review once finalised (expected mid December 2022), will be used to inform industry discussions on whether a whole of industry Animal Care Assurance program is needed and if so, what it should look like. The consultant's report and industry discussions would then guide a process of extensive industry consultation and any decisions regarding a program will ultimately be made by ADF and ADPF.

Recognising the time commitment required to develop, refine, and implement a program that meets industry's needs, it is recommended that Target 7.1 highlight the industry's commitment to

develop a program/standard, and once developed, can be updated to include Indicators for the level of uptake and adoption.

## **7.2. All of industry adopting relevant recommended industry practices for animal care**

The animal health and welfare practices included in the current Framework are either policies developed by the ADF Animal Health and Welfare Policy Advisory Group and adopted by the ADF and ADPF, or from the nationally agreed Australian Animal Welfare Standards for Land Transport (2012) and for Cattle (2016). The ADF has previously endorsed these Standards and Guidelines.

Based on the key outcomes from the Working Group described above, alterations to Indicators and Metrics under Target 7.2. are required to be more aspirational, meet public and industry expectations whilst retaining reference to 'success stories' such as tail docking and calving induction.

Whilst there was mixed feedback on moving away from a 'shopping list' approach to Target 7.2., the approach taken below speaks to the need to be more aspirational and include actionable/demonstrable metrics that reflect future animal care priorities. The working group proposed several indicators as shown in Appendix 2 that are considered measurable and achievable, given that many are based on the Australian Animal Welfare Standards and Guidelines that have already been endorsed by industry. It was suggested that Indicators relating to the use of biosecurity plans, lameness and heat stress strategies be retained to reflect outcomes of the 2019/2020 Materiality Assessment.

A new 'draft' indicator relating to cow longevity has also been proposed to reflect the sentiment of the Working Group but requires further industry consultation and research to define an Indicator and Metric that is measurable.

Importantly, should the ADF Calf Task Force recommend and implement a policy on surplus calf management, it would be reflected under Target 7.2.

## **7.3. 90% of consumers believe dairy farmers do a good job of caring for their animals**

The Sub-committee were agnostic about this indicator, and it is proposed to leave this as is.

## **7.4. The dairy industry uses antibiotics responsibly, as little as possible, as much as necessary, to protect the health and welfare of our animals**

Australia does not have a national, coordinated surveillance program for monitoring antimicrobial use (AMU) and resistance (AMR) across the animal production sectors. Whilst animal product residue monitoring is carried out on both dairy products and meat via the Australian Milk Residue Analysis (AMRA) Survey and National Residue Survey (NRS) as well as on an individual processor level, and AMU is monitored using veterinary sales data triennially by Dairy Australia, the Australian dairy industry is the only animal production sector that does not currently have any industry-funded, periodic assessments of AMR. A recent study was completed by Meat and Livestock Australia (MLA) to determine the presence of non-wild type (NWT) populations of bacteria, as opposed to wild type (WT), from the faeces of cattle at slaughter, which were then assessed for their response to antimicrobials. This study enables the beef industry to provide evidence to stakeholders that populations of NWT isolates to antimicrobials considered highly important for human health are low in beef cattle and specific production practices, such as grain-feeding, are not disproportionately associated with the development of NWT isolates. Therefore, in the absence of a national, coordinated surveillance program, it is recommended that the Australian

dairy industry implement a system for periodic reviews to monitor dairy cattle for the development of resistance to antibiotics of high importance to human health in Australia.

In addition, Australia is currently lagging relative to international competitors with respect to national measures to support on-farm antimicrobial stewardship. For example, in the European Union, there is a commitment to reduce overall sales of antimicrobials for farmed animals and in aquaculture by 50% by 2030 as part of the Farm to Fork Strategy within the EU Green Deal. In addition, on the 28 of January 2022, the EU Veterinary Medicine Regulation came into effect. The key elements of importance to dairy include a ban on prophylactic (preventative) use of antimicrobials, metaphylactic (to prevent spread in the event of an outbreak of existing disease) use in groups of animals is restricted, and certain antimicrobials are reserved for humans only. Medicated feed prescriptions are only valid for five days, can only be prescribed for two weeks and cannot contain more than one antimicrobial. The legislation explicitly states that antimicrobials 'shall not be applied routinely nor used to compensate for poor hygiene, inadequate animal husbandry or lack of care or to compensate for poor farm management'. Member states are also required to collect data on the sale and use of antimicrobials in animals. Importantly, Article 118 of the Regulation asserts that restrictions applying to antimicrobials in the EU will also be applicable to animals or food of animal origin imported into the EU.

To align with international moves away from the use of antimicrobials prophylactically (i.e., preventatively) and ensure the Indicators are realistic, achievable, and measurable, two Indicators are proposed. The first, is that where in-feed antimicrobials (including ionophores) are used for the management of ruminal acidosis, that this be reviewed by the farm's veterinarian at least every 12 months. The Australian Milk Quality Steering Group (AMQSG; aka Dairy Moving Forward Milk Quality Community of Interest) has proposed that 'All farms, where appropriate, are using part-herd (selective) antibiotic dry cow therapy'. Whilst many international counterparts have a more quantified target, to abolish the use of blanket dry cow therapy altogether, the AMQSG did not support this approach due to the risk, where part-herd dry cow therapy was used inappropriately, of adverse outcomes for animal welfare and milk quality. Members of the AMQSG recommended that any targets should encompass considerations around awareness of correct and evidence-based recommendations and tools to ensure the appropriateness of part-herd (selective) antibiotic dry cow therapy use.

Whilst the existing Indicator, that 'Antibiotics of high importance to human Antimicrobial Resistance (AMR) in Australia are only used to treat dairy livestock in exceptional circumstances where no other alternative exists' is appropriate, it has not been possible to measure using existing data sources. It is proposed that this metric is changed to 'all farms being visited by a dairy cattle veterinarian in the last 12 months' and 'all farms having treatment protocols for common conditions (e.g., clinical mastitis, lameness, uterine infections, calf disease), developed and reviewed annually by their veterinarian'. The metrics for these Indicators can be captured either via self-reporting by farmers in the Animal Husbandry & Genetics Survey and/or via third-party in the future Animal Care Assessment Program.

## **Recommendation**

It is recommended that industry stakeholders consider and provide feedback on the proposed draft Goal 7 key Targets, Indicators and Metrics. This feedback will be used in wider industry consultation, including during the Industry Consultative Forum proposed for early 2023

## Appendix 1. Targets, Indicators and Metrics, current and updated (for consultation)

Existing			For consultation	
	Most recent	2030 Target		
			Baseline	2030 Target
<b>7.1. 100% ongoing compliance with legislated animal welfare standards.</b>			<b>7.1. An Australian Dairy Industry Animal Care Assessment Program is developed.</b>	
% Of farmers who have a copy of the AHW Standards and Guidelines	77%	100%		
% Of farmers who agree complying with animal welfare standards is an important sustainability requirement	98%	100%		
<b>7.2. All of industry adopting relevant recommended industry practices for animal care.</b>			<b>7.2. All of industry adopting relevant recommended industry practices for animal care.</b>	
No tail docking	96%	100%	<i>See Appendix 2. Indicators and Metrics for consultation for Target 7.2.</i>	
No routine use of calving induction	100%	100%		
All calves managed appropriately				
- Sale calves sold at a minimum of 5 days old	91%	100%		
- Sale calves fed within 6 hours of transport	99%	100%		
All calves disbudded				
- Prior to two months of age	72%	100%		
- With pain relief (for calves <2 months)	76%	100%		
All farmers implementing a lameness strategy	96%	100%		
All farmers where relevant, have infrastructure to keep cows cool	96%	100%		
All farmers have a documented biosecurity plan	58%	100%		
<b>7.3. 90% of consumers believe dairy farmers do a good job of caring for animals</b>	72%	90%	72%	90%
<b>7.3. 90% of consumers believe dairy farmers do a good job of caring for animals.</b>				
<b>7.4. Antimicrobial Stewardship (AMS) – the dairy industry uses antibiotics responsibly – as little as possible as much as necessary – to protect the health and welfare of our animals</b>			<b>7.4. The dairy industry uses antimicrobials responsibly, as little as possible, as much as necessary, to protect the health and welfare of animals, people, and the environment.</b>	
All dairy farmers access antibiotics from a registered vet	100%	100%	All dairy farmers use antimicrobials under veterinary direction:	

Existing			For consultation		
	Most recent	2030 Target		Baseline	2030 Target
			<ul style="list-style-type: none"> <li>Farms visited by a dairy cattle veterinarian in the last 12 months</li> <li>Farms following treatment protocols for common conditions that have been developed and reviewed annually by their veterinarian</li> <li>Farms where in-feed antimicrobials (including ionophores) have had the use reviewed by a dairy cattle veterinarian in the last 12 months.</li> </ul>		100%
					100%
All dairy farmers use antibiotics responsibly under veterinary direction	90%	100%	The Australian dairy industry monitors dairy cattle for the development of resistance to antibiotics of high importance to human health in Australia <sup>1</sup> .		
Antibiotics of high importance to human Antimicrobial Resistance (AMR) in Australia are only used to treat dairy livestock in exceptional circumstances where no other alternative exists.	Not measurable		All farms, where appropriate <sup>2</sup> , are using part-herd (selective) antibiotic dry cow therapy.		100%

<sup>1</sup> According to The Importance Ratings and Summary of Antibacterial Uses in Human and Animal Health in Australia (Australian Strategic and Technical Advisory Group on Antimicrobial Resistance; ASTAG).

<sup>2</sup> Appropriateness as defined by Countdown guidelines; and includes 1) all staff having received third-party training in the last three years; 2) herd bulk milk cell count (BMCC) of less than 250,000 cells/ml in the last 12 (TBC) months; 3) At least one individual cow cell count (ICCC) for each cow within at least 80 days of planned dry-off date; 4) complete and accurate clinical case records; 5) Less than 25 clinical cases of mastitis per 100 cows (25%) within the last 12 months; 6) absence of *Streptococcus agalactiae* based on PCR testing and individual cow milk cultures.

## Appendix 2. Indicators and Metrics for consultation for Target 7.2.

The Indicators and Metrics proposed for consultation by the Goal 7 Sub-committee are summarised below. The first list indicates those Indicators and Metrics that were considered highest priority, and the second list indicates those Indicators and Metrics that were raised and discussed but considered lower priority or more difficult to measure and report against between now and 2030. Note that the intention is for these metrics to be measured via the Dairy Australia Animal Husbandry & Genetics surveys until the implementation of an Animal Care Assessment Program.

High priority:

- Painful procedures are replaced, reduced, or refined:
  - Calves disbudded with local anaesthetic and an anti-inflammatory (minimum) (100%)
  - Animals receiving pain relief for painful conditions (e.g., mastitis, lameness, dystocia) (100%)
  - Farmers using polled genetics (TBC)
  - Male calves castrated with a rubber ring between one and 14 days of age with pain relief (100%)
- Best care for all animals
  - Farmers implementing a lameness management strategy that includes key practices for prevention, early detection, and effective treatment (100%)
  - Farmers implementing a heat stress management strategy that includes key practices for managing heat stress during milking time, provision of drinking water at all times and adequate shade for the whole herd (100%)
  - Longevity of cows in the herd is increasing year-on-year according to the five-year rolling average (TBC)
  - Cows undergoing tail docking (0%)
  - Cows undergoing routine calving induction (0%)
  - Downer cows assessed and treated or euthanised if required without delay (100%)
  - Animals have access to shelter from inclement weather (100%)
  - Calves disbudded using a hot iron under two months of age (100%)
  - Calves receiving supplementary colostrum within 12 hours of birth (100%)
  - Calves kept in the company of other calves from at least three weeks of age (100%)
  - Calves with ad lib access to drinking water from birth (100%)
  - Sale calves sold at a minimum of 5 days old (100%)
  - Sale calves fed within 6 hours of transport (100%)
  - Sale calves have no more than 30 hours' time-off-feed (100%)
  - A licenced close-range firearm to the brain or a captive bolt to the brain by a trained and competent person is used to euthanise animals (100%)
  - Animals euthanised using blunt force trauma (0%).
- Indicators and Metrics which report against the ADF Surplus Calves Policy currently under development.
  - Farmers using quality beef genetics to breed surplus calves that are economically attractive potential beef buyers/rearers
  - Farmers implementing a documented plan to minimise the number of surplus calves euthanised at birth and/or slaughtered between 5 and 30 days
- Farmers implementing a documented biosecurity plan (100%)



Additional topics for Indicators and Metrics for consideration that were considered a lower priority or less measurable:

- Cows with free-choice access to pasture
- Herd bulk milk somatic cell count (BMCC)
- Cows with clinical mastitis
- Cows with lameness
- Cows culled involuntarily (e.g., injury, disease, reproductive failure)
- Provisions to ensure continuity of milking during emergencies (e.g., generators)
- Documented emergency management plan
- Documented commitment to animal care
- Herd culling rates
- Transport exceeding 8 hours
- Adoption of practices complying with state-based animal welfare legislation and AWS&Gs
- Handling of calves less than 30 days with care
- Feeding of milk via teat
- Calves fed high volume feeding until weaning
- Use of beef semen
- Herd body condition