South Australian Dairyfarmers Association
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26D045

20 February 2026

Ms Leanne Mundy
Australian Animal Welfare Strategy program section
Department of Agriculture, Fisheries and Forestry
GPO Box 858, Canberra City ACT 2601
Via email aaws@aff.gov.au.

Dear Ms Mundy,

RE: SA Dairyfarmers' Association Feedback on AAWS Livestock & Production Chapter Draft

Thank you for the opportunity to provide feedback on the working draft of the Australian Animal Welfare Strategy's Livestock and Production chapter (AAWS). As the peak body representing South Australian dairy farmers, SADA fully supports the vision of achieving high standards of animal welfare across Australia, guided by robust science and evidence. We also recognise the importance of sustaining community trust, market confidence, and trade integrity in our production systems.

Our feedback focuses specifically on critical issues, factual accuracy, unintended consequences, and strategic opportunities that are most relevant to the dairy sector.

1. Critical Issues, Omissions and Unintended Consequences

1.1 Framing of Current Welfare Outcomes

The draft highlights continuous improvement, but some language may unintentionally suggest deficit in Australian livestock welfare systems. The dairy industry already operates under science-based standards, nationally agreed frameworks, and strong regulatory oversight. We recommend clarifying that:

- Australia achieves high animal welfare standards both globally and nationally. For example, 91–96% of dairy farms comply with key welfare practices such as lameness management, no tail docking, and appropriate calf care, according to the Animal Health and Genetics Survey[1] (AHGS 2016–2019; next survey due 2025).
- Existing systems are supported by science, regulation, and industry quality assurance programs.
- Continuous improvement builds on existing strengths rather than pointing out deficits.

No routine calving induction has been practiced since 1 January 2022, reflecting welfare-aligned management practices[2].

1.2 Case Study – Calf Welfare (Bobby Calves)

The draft's existing case study on early-life slaughter of non-replacement dairy calves provides a valuable overview. As an addition, we suggest highlighting proactive, industry-led innovation in welfare, including:

[1] DA Sustainability-Scorecard-2024
[2] DA Sustainability-Scorecard-2024

- Adoption of sexed semen and genomic selection to reduce surplus calves.
- Herd management protocols that improve overall herd health and align welfare outcomes with productivity objectives.

This addition demonstrates that the dairy sector is actively investing in practical, science-driven approaches to calf welfare, complementing the example already provided.

Suggested wording for the addition:
"In addition to existing practices, the dairy sector is implementing science-driven approaches to calf welfare, including sexed semen, genomic selection, and herd management protocols that reduce surplus calves, improve herd health, and align welfare outcomes with productivity objectives."

1.3 Recognition of On-Farm Responsibility and Commercial Viability

The chapter describes animal welfare as a shared responsibility. It would benefit from clearer recognition that:

- Producers carry primary legal and operational responsibility for day-to-day welfare outcomes.
- Welfare outcomes are closely linked to farm viability and sustainable business models.
- Policy settings must account for seasonal variability, climatic differences, and diverse production systems.

Policy reforms that do not consider economic feasibility and regional diversity risk unintended consequences for farm sustainability and animal welfare.

1.4 National Harmonisation and "Rapid Adoption"

National consistency in animal welfare standards is supported. However, references to "promoting rapid adoption" of harmonised legislation should be tempered with recognition that:

- Regulatory change must be science-based.
- Comprehensive regulatory impact assessments are required.
- Transition periods are essential to allow on-farm adaptation.
- New requirements should complement existing quality assurance programs rather than duplicate them.
- International competitiveness and trade impacts should be considered.

National coordination should not reduce regulatory quality or practicality.

1.5 Workforce Capacity as a Welfare Enabler

The draft refers to the veterinary workforce but does not sufficiently acknowledge workforce shortages in rural and regional Australia. Veterinary access is a key enabler of animal welfare outcomes. We recommend recognising rural veterinary workforce sustainability as a strategic risk and opportunity.

1.6 Clarification of Regulatory Roles

The section referencing non-government organisations managing compliance may create ambiguity regarding enforcement. It would be helpful to clarify that:

- Animal welfare enforcement authority rests with state and territory governments.
- Any NGO involvement occurs under contractual or delegated arrangements.

Precision in describing governance arrangements is important in a policy document of this nature.

2. Opportunities – Additional Recommendations for the Dairy Sector

2.1 Recognising the Welfare-Productivity Link

Animal welfare and productivity are strongly aligned. In dairy systems:

- Reduced lameness improves longevity and milk yield.
- Effective mastitis management improves animal wellbeing and milk quality.
- Improved reproductive performance enhances herd stability and health outcomes.

Highlighting this link reinforces that welfare is integral to business sustainability, not just a compliance requirement.

2.2 Australian Dairy Sustainability Framework as a Case Study

We recommend including case studies drawn from the Australian Dairy Sustainability Framework (ADSF)[3] and its public reporting. The Framework includes a 2030 commitment to provide "best care for animals for whole of life," demonstrating whole-of-industry accountability. Progress is reported annually through a scorecard process.

This provides an example of:

- Industry-led governance
- Measurable welfare commitments
- Transparent public reporting
- Continuous improvement aligned with science and evidence

2.3 Science-Led Genetic Innovation

As part of ADSF, the dairy sector is adopting:

- Sexed semen technology to reduce surplus non-replacement calves
- Genomic testing and selection for traits such as health, longevity, and welfare outcomes
- Polled genetics adoption to reduce the need for dehorning

These tools reduce potential welfare concerns, support productive outcomes, and demonstrate how science-based innovation addresses community concerns while maintaining farm viability.

2.4 Technology Adoption in Dairy Systems

AI-enabled monitoring and sensor technologies are increasingly used in Australian dairy farms to support precision animal welfare management.

- Automated milking systems allow cows to voluntarily access milking, reduce stress, improve udder health, and provide real-time data for early detection of health and welfare issues.
- Wearable collars and ear tags track activity, rumination, heat stress, and reproductive status, enabling timely interventions to support individual and herd wellbeing.
- These technologies must be practical, commercially viable, and adapted to specific farm systems, particularly in pasture-based operations, complementing traditional husbandry practices rather than replacing them.

Precision technologies like these help farmers monitor, measure, and improve welfare outcomes continuously, while supporting productivity and overall herd health.

[3] ADSF

2.5 Transparency Through Public Scorecard Reporting

The ADSF's annual scorecard reporting provides a transparent mechanism for tracking welfare-related progress in the dairy industry. This could be referenced as an example of how transparency can be achieved through nationally coordinated industry frameworks, rather than relying solely on retailer-driven or fragmented private certification schemes.

3. Suggested Additional Case Studies

In addition to the calf-focused case study, we recommend including:

- The 2030 "best care for animals for whole of life" commitment under the ADSF
- Adoption of genomic selection, sexed semen, and polled genetics to improve welfare outcomes
- Industry-led lameness reduction and mastitis management programs
- Heat stress mitigation strategies in northern dairying regions
- Precision technology adoption (robotic milking, wearable sensors)
- Quality assurance frameworks that integrate welfare with broader sustainability goals

These examples demonstrate measurable, science-led improvement and reinforce that welfare advancement is embedded within mainstream industry practice.

4. Conclusion

We support the chapter's emphasis on science-based standards, collaboration, and continuous improvement. To ensure the document progresses effectively through governance processes and maintains trade confidence, we recommend:

- Stronger recognition of existing high standards
- Careful framing to avoid unintended reputational risk
- Clear delineation of regulatory roles
- Explicit acknowledgment of commercial feasibility and regional diversity
- Inclusion of industry-led, measurable examples such as the ADSF and precision technology adoption

The Australian dairy industry remains committed to ongoing welfare advancement underpinned by science, evidence, and practical experience. We welcome continued engagement to ensure the chapter accurately reflects both current practice and future opportunity.