

The Humane Farm Animal Care's CTM application should be rejected as the documentation is using units that are not legal in Australia. The reference is Australian Measurement System<sup>1</sup> which requires the use of SI units. There are wide variations in the use of non-compliant units. For example the use of a non-compliant unit without an SI equivalent is widespread in the Dairy Cow manual while they are on the level of isolated typographical errors in the Turkey manual. Examples of non-compliant units are:

HFAC Standards For Production Of Dairy Cow

- quarts, Page 5,
- “, Page 10
- °F, Page 10
- inches, Page 12
- inch, Page 12
- feet, Page 13
- ', Page 15
- sq. ft, Page 15
- lbs, Page 16

HFAC Standards For Production Of Turkeys

- ft, Page 3
- linear ft, Page 3
- ft<sup>2</sup>, Page 14

All the manuals should be rejected until legal units are provided for each measurement. There are just so many defects in the manuals that I haven't tried to document every instance. Litre and metre are legal SI units in Australia, not Liter and meter which is used in the HFAC manuals.

HFAC Standards For Production Of Dairy Cows, Page 28

3. Pain Management: Metacam 20 (Meloxicam) is approved pain management in Canada and Canadian producers must use this for any of the procedures listed above. Metacom has a 96-hour milk withdrawal period.
4. In the U.S. see information below:  
*Pain management options should be considered keeping in mind that use of unapproved drugs must follow the AMDUCA regulations. Meloxicam tablets administered orally at the rate of 0.45 mg/lb (1 mg/kg) are reported to be a costeffective means of providing analgesia in cattle. In European countries where Meloxicam is approved, 15-day meat and 5-day withdrawal time for milk is recommended. See Appendix 4<sup>2</sup> for additional information on pain control methods. In Canada Metacom 20 has a 20 day meat withdrawal period and a 96-hour milk withdrawal period.*

Note: Derogation to this standard will only be granted if the farmer can show that they cannot legally obtain sedatives, local anesthetics or similar medications.

**H 11: Medicines must be:**

- a. Clearly labeled;
- b. Stored in accordance with label instructions;
- c. Kept in a secure store which is safe from animals and unauthorized people;
- d. Kept separate from food producing areas, including the milking parlor;
- e. A person responsible for the management of the medicine storage must be indicated

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<sup>1</sup>Australian Government, Department of Industry, Innovation and Science, Australia's Measurement System:-  
<https://www.industry.gov.au/regulations-and-standards/australias-measurement-system>

<sup>2</sup>Appendix 4, Page 44 states “Meloxicam (20 mg/mL) is approved for use in cattle in several European countries with a 15-day meat withdrawal time and a five-day milk withdrawal time following administration of 0.23mg/lb IM or SC.”

- and that person must keep the appropriate records for stock control purposes;
- f. Any medicines used in the U.S.A. must be licensed for use in the U.S.A.

Withholding periods and other conditions for cattle and milk in the manual is not appropriate in Australia. The HFAC manual may cause unfit for human consumption milk to be supplied to market or fed to calves when it should be withheld. Reference is Metacam<sup>®</sup> 20<sup>3</sup> (Active constituent 20 mg/mL MELOXICAM) in Australia has the following:

**Withholding Periods**

**MILK:**

Milk collected from cows within 6 days (12 milkings) of treatment **MUST NOT BE USED** for human consumption, processing, or fed to bobby calves.

AMDUCA regulations referenced in the HFAC manual would appear to be irrelevant in Australia and there should be an appropriate reference. This is only one example of the problems with the HFSC documentation

The HFAC's 5 point Body Condition Standard and recommendations that a BCS score of 2 is suitable for transport when under the Australian 8 point BCS scoring system for dairy cattle BCS range of 3 - 6 is used as the healthy range.

The manuals in general do not appear to be appropriate to Australian condition, regulations, etc., given the references to USA organisations, US standards, US regulations, etc. None of the members listed on the Science Panel appear to be Australian so there must be doubt that the manuals are appropriate for Australia. The HFAC Standards For Animal Care of Egg Laying Hens, Page 1 states:

The standards are based on the Royal Society for the Prevention of Cruelty to Animals (RSPCA) guidelines, current scientific information and other practical standards and guidelines recognized for the proper care of animals.

Then Page 13 states:

***Free Range:** is a management system in which adult birds are kept in houses with daily access to an uncovered outdoor area weather permitting. The minimum outdoor space requirement is 2 square feet (0.19 square meters) per bird to meet the Animal Care Standards for Free Range.*

A hectare is 10,000 square metres and at a density of 0.19 square metres per bird there would be 52,631 birds per hectare. The RSPCA, 3 Burwood Highway, Burwood East 3151 to the best of my knowledge has never advocated that stocking density for free range hens. It would be appropriate for the ACCC to contact the RSPCA and confirm this stocking density meets their guidelines. Just on the basis of this free range stocking density and Australian standards the application for registration should be rejected.

There should also be an examination of the cost and appropriateness of the appeal system for an Australian registered scheme. A person raising a certification dispute has to bare the full costs of any appeal, inspections plus use the appropriate court closest to the HFAC headquarters in the USA.

There are just so many errors and problems with these HFAC standards that the application for registration can not be supported. The aim of the organisation may be noble but this is such a flawed application for registration that it must be rejected. Apply when the defects in the documents have been addressed.

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<sup>3</sup>Boehringer Ingelheim, Metacam<sup>®</sup> 20 mg/mL:- [http://files.boehringer.com.au/files/CMI/Metacam 20 AU.pdf](http://files.boehringer.com.au/files/CMI/Metacam%20AU.pdf)