



ADG Inc is a commercially based dairy goat organisation that also includes stud members. ADG Inc would like to make a submission to the Productivity Commission into the red tape in Agriculture on behalf of our members.

The dairy goat industry is rapidly expanding, it has the potential to grow much larger, but there are a number of areas that may impact the industry and limit this future growth.

One of the largest concerns for the dairy goat industry is the very small number of Agricultural and Veterinary chemical products that are currently registered for use in goats and especially lactating dairy goats.

This is creating a number of issues, listed below, for both producers and veterinarians that are responsible for dairy goats –

- Producers can be forced to choose between maintaining herd health, and welfare of their animals and using these products 'off label' which can be illegal.
- Using any product 'off label' may then lead to a breach of their on farm quality assurance program.
- Breaching their QA program may mean that they cannot supply milk for manufacturing. Thus impacting on the financial viability of their business.
- Forcing producers to use 'off label' or minor use permits to ensure the viability of their business, can have far reaching implications beyond the boundaries of their enterprise, these may include chemical residues entering our food chain due to lack of correct with holding periods being stated on products.
- Veterinarians are very reluctant to administer or prescribe products to lactating dairy goats that may later be used for milk production. This is due to lack of support for veterinarians who want to prescribe off label in goats e.g. in the USA, veterinarians can access a government service via the internet (www.farad.org), email or mobile phone app to access the withdrawal period that are needed for goats. Also some veterinary medicines have a 'Do not use' statements placed on products label that are not registered for use on dairy goats, deeming it illegal to use, even with a vet's prescription. .

As an industry we understand that due to the financial costs, it is unrealistic to expect ag/vet chemical manufacturers to conduct Australian trials on all products that may be used to maintain animal health within our businesses. But in acknowledging this we also know that there are many such products available in Australia that are registered for other forms of livestock such as sheep and cattle, that in fact have overseas data stating correct with holding periods and dose rates for goats.

The areas of greatest concern to producers are as follows

- Anthelmintics – products for the control of internal and external parasites on all ages of dairy goats, the correct dose rates need to be listed, to ensure longevity and efficacy and minimise the onset of chemical resistance. Correct with holding periods are required to ensure chemical residues do not accidentally enter our food chain, and ensuring that producers can adhere to their on farm quality assurance programs.
- Pain relief – during normal husbandry practises such as disbudding and castration, producers and veterinarians want to be able to access pain relief products such as Meloxicam, which is registered for cattle, sheep, pigs and horses, but not goats.

- Coccidiostats – as the industry grows, operations are becoming more intensive and the need for these products will increase to ensure animal health.
- Acidosis control/modifiers – high producing animals need a high level of protein to maintain production and health. Goats seem to be more susceptible to acidosis than dairy cattle, currently the two most widely used products in the dairy cow industry – Rumensin and Bovetec cannot be administered to dairy goats.

Possible solutions for the use of these products may involve –

- The need to remove the ‘Do not use’ statements on products unless it is a proven fact that its use could lead to contraindications.
- Replace ‘Do not use’ statements with “no residue data available for goats or dairy goats in Australia” and then the private veterinarian could still use these drugs and recommend with-holding periods from overseas or textbooks with an added safety factor based on their professional knowledge.
- Recognition of overseas data, and/or an Australian default With- Holding Period (WHP) as happens overseas of say 35 days & /or a default Maximum Residue Limit (MRL) of say 0.01mg/kg because if a vet medicine is not registered for that species the default is zero and labs can now test down to 1 part per billion.
- Standardize control of use legislation across Australia to similar to that which applies in Victoria so that sheep or cattle” over the counter” products can be used in goats, but with the additional freedom to increase the dose rates to above those used in sheep so that anthelmintics can be used at the correct dose rates for goats (currently only the same dose rates as sheep can be used, despite research showing goats need a higher dose rate). Under-dosing goats with anthelmintics leads to drench resistance.

As the dairy goat industry expands these problems will become exasperated and have the real potential to limit growth. Farmers, and those servicing the farming sector, need to be able to operate within the law and abide by any quality assurance programs that may be relevant to their business.

It is also very important that we are able to meet the growing expectations of the public in relation to food safety and animal health and welfare. Consumers need to be confident that the products they are purchasing are safe, and have been produced from animals that have been given the very best of care.

Kind regards

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