

## **MINISTRY FOR PRIMARY INDUSTRIES**

### **Animal Welfare Regulations Development Workshop on Bobby Calves**

#### **Workshop with Industry Stakeholders**

*4th February 2016, 9.00am – 5.00pm*

*Meetings on the Terrace, 152 The Terrace, Wellington 6011*

**Attendees:** ANZCO Foods, Beef + Lamb New Zealand, Dairy Cattle Veterinarians, DairyNZ, DCANZ, Farmers, Federated Farmers, Fonterra, Meat Industry Association, MPI (ACVM, Compliance, Legal, Policy, R & A, VS), NAWAC, NZ Petfood Manufacturers, NZVA, RNZSPCA, Road Transport Association, Transport Operators.

***Please note: The views and opinions expressed in the notes that follow are a summary of those issues and concerns put forward by attendees at the above workshop. They are not the views of the Ministry for Primary Industries.***

#### **Overarching themes**

MPI opened the meeting by providing the broader context for the day, outlining the fact that a project to develop a broad set of animal welfare regulations was underway and that this provided an opportunity to consider regulations that may be enacted prior to the beginning of the next bobby calf season. Taking the existing Codes of Welfare as a starting point, the aim is to develop a suitable regime that can be enforced effectively.

There was a general agreement across all groups that any perception of bobby calves as a 'waste product' needs to change in order to drive proactive changes in the industry supply chain. This needs to happen to protect the perception of all New Zealand dairy and meat industries in the local *and* global market. Although this attitude is not wide-spread, it can be extremely damaging. There was general agreement that welfare issues relating to bobby calves risk impacting on the reputation of the meat, petfood and other industries as well as on dairy.

It was stressed by many attendees that while there are several reasons for looking at the issues with bobby calves, focus needs to be put on the animal welfare concerns that need addressing. The group discussed the relative welfare requirements of calves in the beef and dairy industries. Many argued that there should be no distinction because a young calf has the same needs regardless of the industry it is in. Some attendees, however, argued that the problems that had been highlighted were essentially 'a dairy issue' because the substantially higher financial value associated with young beef calves as opposed to bobby calves provides a greater incentive for all participants in the supply chain to ensure that they remain fit and healthy. For that reason they questioned the justifiability of adding regulatory burdens on beef farmers. They also pointed out that many of the specific issues under consideration (age, shelter, transport etc.) rarely applied to young calves on beef suckler farms or to dairy keeper calves.

The proposals discussed by the attendees of the workshop are a mix of regulatory and non-regulatory practices. Industry initiatives are more flexible and able to address practical issues within the supply chain. The workshop was not about setting specific standards against only 'bottom-dwellers' as calves can die as a result of actions at various sources (farms, during transport and processing works) and can be the result of accumulated difficulties across the supply chain, as well as individual instances of poor practice.

Groups agreed that scientific research should be the central starting point for deciding how we prescribe requirements. We need to look at what causes the issue, whether the industry already self-regulates, and if a regulation is needed at all.

There was strong support for farmers having explicit responsibility to select and separate calves for transport. It was suggested by several attendees that if a farmer only selects fit animals for transport, then the animal should be robust enough for the entire process until slaughter, provided that this is completed within a reasonable time frame, using fit for purpose transport and facilities operated by trained and competent staff.

At the same time, most groups expressed the view that if any regulations are developed, they must be workable and not put too much burden on the farmer. If the regulations are too tough to comply with then it could cause unintended consequences with more calves being killed on farm.

All groups agreed that better communication is needed at all points across the supply chain. Each stakeholder needs to be better informed, and in a more timely way than the current situation. If a calf is dead on arrival (DOA) or unfit at pick-up, then the farmer needs to be notified immediately. Real-time feedback is needed so that the issue can be addressed quickly. Fonterra text messages farmers immediately if there are issues with the milk – this technology should be adapted to apply to the bobby calf supply chain. All relevant industry organisations need to be included in the notification process, as they have a vested interest in ensuring farmers meet their obligations. This will also allow them greater opportunities to address some of the issues in the supply chain. Rapid communication should not be a problem with available and future technology.

Across all groups, education along the supply chain was needed to improve the knowledge and understanding of how to handle and treat bobby calves. The workshop highlighted that there is a lack of knowledge in some areas. Getting information across the supply chain can be difficult, and more innovative ideas of how to disseminate information and get participants to engage with that information is needed.

In the opening rounds several attendees suggested the use of a seasonal animal status declaration (ASD) form, or extending the use of supply contracts to monitor calf welfare. This would ensure transparency in terms of the activities of each player along the supply chain, and would enable regulators to allocate accountability correctly. This idea received support from members of most groups. There were two interpretations of this kind of document: a commercial supply contract self-regulated by industry, or the development of a new bobby calf ASD incorporated into the Regulations and administered by MPI.

The proposed point of having either form would be to have a bobby-calf specific document that spells out the terms and conditions (which could be stated in regulations) that different players in the supply chain were explicitly required to meet. It was also expected that there would be guidance material to accompany the document concerning the standards that would be expected of a “fit” calf, which would support the education and training of farmers or transporters.

Attendees supported this kind of document as it would enable the tracking and monitoring of an animal through the supply chain. It would also allow enforcers to have something to go back to when the standards are not being met and to determine who was responsible. While this kind of document would primarily exist between a farmer and processor, it was suggested by some that it should also apply to transporters in a similar way - through the contract between processors and transporters. Responsibilities could also be placed in the processor-transporter contract requiring the notification of the farmer or enforcers (MPI or SPCA) if calves arrive at processing plants unfit.

The feasibility of this document was questioned by several attendees. Some thought that requiring farmers to complete the form, or transporters to carry the form, would be impractical, while others questioned having one seasonal document because of the changing circumstances throughout a season. It was also noted that a document of this type would require the post mortem of all DOA or condemned calves to identify why they died. This carries cost implications for processing plants and it was also recognised that post-mortems cannot necessarily be relied upon to always provide every piece of information that might be sought (e.g. exact cause of death and time at which this cause occurred).

It was agreed that if this idea was to be progressed, time would be required to work out the logistics of the form and how it should operate across the supply chain. It was questioned whether this could be trialled on a voluntary compliance basis at the outset.

### **Fitness for Transport / Age**

Fitness for Transport (FFT) was a large discussion area that branched into some of the other areas proposed for discussion.

#### *Age*

In relation to age, all three groups thought that extending the minimum age of a calf prior to transport would usually result in more robust animals. However, this was balanced by arguments put forward that fit and healthy four day old calves are robust enough, providing that the other parts of the process are well managed. There was consensus that “four days old” should always mean four full days, not three and a bit. There was no clear agreement over whether age should be regulated or not. Age itself is hard to prove and measured differently from farmer to farmer i.e. while one may measure from time of birth, another may measure from the time the calf arrives in the pen.

Overall, it was agreed that age is just one marker in a group of factors that makes up fitness for transport. The most important thing was that calves are robust and healthy, regardless of age.

#### *FFT*

Groups discussed separating bobby calf FFT from general animal FFT as the business models are different. Most attendees thought that they should not be separated to keep FFT as simple as possible. However, all agreed that if they were separated, bobby calf regulations should be stricter than general regulations.

There was general agreement from the groups that the recommended best practice criteria in the Transport Code of Welfare represented a fit calf and would be a good guideline, but should only be regulated if the final wording could be clear and easily adhered to. It was acknowledged by most attendees that the criteria that needed regulating the most were the hardest to articulate clearly (e.g. age and feed). Adding other factors such as showing signs of dehydration, or including a distance criteria were also positively discussed by groups.

Groups discussed requiring a farmer to be present when the calves were being loaded as this would ensure that a conversation between transporter and farmer about the animals being FFT would happen. Then the ultimate selection of an animal as FFT could fall on the transporter as they would

have agreed at that point to accept the calf. However, given this is not common practice for some farmers, the practicability of this suggestion was also questioned.

There was support from most groups for regulating FFT criteria. It would enable transporters to resist farmers who put pressure on them to take unfit animals – at the moment, many transporters feel as if they must take the risk of transporting unfit animals or lose the farmer's business.

Groups were divided on how the regulations should be crafted. Some thought that regulations shouldn't be too prescriptive as this would limit a farmer's ability to choose *how* to comply – regulations should just describe the outcome desired. The difficulty with this is that outcome-based regulations may not be specific enough.

Issues with regulating FFT and age:

- Based on current practice, it is not always possible to confidently identify whether a calf is 4 days old.
- Some merits were identified for increasing the age at which calves may be transported, but these were balanced by arguments that fit and healthy four day old calves are robust enough to cope. It was suggested that more research would need to be done about the differences between transporting a calf at different ages, for example from 1 day to 10 days.
- Should bobby calves have different FFT standards from other animals?
- Where should the responsibility for ensuring an animal is FFT lie?
- How prescriptive should regulations be?

## **Shelter**

Groups agreed that a regulation specifically relating to shelter should ensure that animals are kept warm, dry and sheltered from the elements, but they recognised that meeting these requirements are situation dependent. There is a significant challenge setting prescriptive requirements that can be applied across farm, transport and processors, as well as relating to different geographical settings in New Zealand.

The minimum standards a regulation should impose are protection from wind, rain and sun, as well as capturing the concept of thermal stress – including being both too hot and too cold.

Changing the structure of a pen could minimise environmental factors that adversely affect calves. Industry groups could work together to come up with requirements for pen structure.

Groups suggested that yearly audits could evaluate whether farms were complying with shelter standards. It was agreed that guidance would be needed to support a regulation so farmers, transport operators and staff at processing facilities know what to do to improve their shelter.

Issues seen with regulating shelter include:

- How are warm, dry or clean defined? It can be difficult to recognise the signs, if any, that animals display when they are too hot or too cold.
- How do you regulate with reference to environmental conditions when the regulation will be imposed in all geographical areas of the country?
- If calves are left behind as they are seen to be unfit for transport, shelter then needs to be adequate to provide for calves being left in the pen for longer periods of time, or there needs to be improved access to farms to eliminate calves being left on the roadside.
- Where calves are left behind, there needs to be a fail-safe means of alerting the farmer.

- Industry recognises that correct shelter is a very difficult area to enforce and prosecute against. There is a perception that rules are easy to break with little penalty.

### **Sufficient food before transport**

There was a consensus across all groups that requiring calves to be fed 2 hours before transport was both impractical and unrealistic. There is also a lack of scientific knowledge of how hunger affects calves, which makes the formulation of specific regulations difficult.

It was noted that there were limited ways to measure hunger in calves. Industry currently uses the 'near-death' standard to prove unacceptable hunger, but there is a wide gap between this and a calf that is fully satiated. Presumably a calf that is "near death" has been suffering from hunger for some time, but at what stage that would become unacceptable from an animal welfare point of view is unknown.

All groups agreed that the current 2 hour standard of pre-feeding calves is not workable, but there was disagreement over how long it should be extended to (4-6 hours).

The main issue with feeding time is the unreliability of pick-up times, so there was lots of discussion focussing on ways in which to improve the communication between farmers and transporters around pick-up times. Systems from text messages to day-before notification systems to calf quota management were all discussed. There were pros and cons to all of these options – but all groups agreed that with current technology something should be able to be done about the issue.

Same-day slaughter was suggested, with some attendees wanting the 2+28 hour rule dropped to 24 hours in total between last feed and the point at which calves must be slaughtered or fed again. This was met with some resistance as it would place even greater weight on the obligations along the supply chain to document feeding times because all parties would need to coordinate their activity more closely within an overall 24 hour window. It could also be hard to stick to during the peak of the season. Some pointed out that bobby calves are already prioritised above other animals at the processors, and warned against unintended consequences in terms of the welfare of those other animals who would have to wait longer for slaughter during busy times.

Setting a maximum period for time in transit was met with mixed views. Some thought that this, combined with feeding provisions, would create a better outcome for calves. Other groups felt that this might be unrealistic, and that it was more about teaching transporters how to load calves and their driving techniques rather than the overall time of the journey.

Issues with sufficient feeding:

- What is an acceptable level of hunger?
- How should we measure hunger?
- How long is too long for a calf to wait for slaughter since its last feed?
- What is the best way to communicate pick-up times to farmers?
- If changed to a 24 hour rule, processes at slaughter plants may need to allow processors to feed calves at plant. Is this practicable/ desirable?

## **Blunt Force Trauma in an Emergency**

Some groups thought that this was a non-issue area which does not need to be regulated. If regulated, it would need a strong scientific basis to justify regulation. There was concern that sensitivity around the issue relates more to matters of public perception than animal welfare.

Alternatively, other groups agreed that in light of recent negative publicity relating to BFT, the New Zealand meat and dairy industries needed to take some action on the issue. The risk to the reputation of those industries is too great to not be seen doing anything about it.

Captive bolt devices are the method recommended by industry for euthanizing an animal and have a significant uptake among dairy farmers in particular. While they are publicly viewed as a more humane alternative to euthanizing an animal than BFT, there were concerns from some attendees that if used by an untrained person, the distress for an animal could be similar to that experienced with BFT euthanasia.

It was noted that the responsibility of transporters in relation to euthanizing an unwell animal was unclear. Questions were raised over how a transporter is to deal with a calf in an emergency situation while in transit, as the use of BFT roadside may spark significant public outcry. It was also noted that if we begin to place responsibility on a transporter to euthanize a calf in an emergency situation, appropriate training and guidance will need to be given to them to ensure it is carried out humanely.

Groups suggested that if blunt force trauma was to be regulated, the exception for emergency situations should be kept. Any situation where it would prolong the animal's suffering to get another method of euthanasia could constitute an emergency.

Some issues and suggestions for this regulation were:

- There is a need to provide a clear definition of what constitutes an emergency.
- The use of the wording 'unforeseen and unexpected' is too broad and subjective. It could be argued that it is foreseeable that it might snow causing a pass to be closed and the truck turned around, for example, but this would not be viewed as the right situation to use BFT
- Could the regulation state "if an animal is suffering pain and distress" then BFT is allowed?
- Some groups were concerned that the word emergency was too broad and subjective.

## **Handling**

There was strong support across all groups for a regulation requiring facilities that allow calves to be walked onto trucks at the point of loading, walked to different levels of conveyance (i.e. top deck of trucks), and walked off trucks at the end of the journey. By definition, groups felt that if a calf could walk on and walk off the truck – it would be robust enough for the journey. Attendees also thought that a regulation expressed in this way should allow the desired outcomes to be met in a way that allowed the farmer a certain level of innovation.

Having calves walk on removes the stress they endure from being handled and any concerns of rough handling. However, an issue that groups identified was that young calves can often be difficult to move, especially after feeding, so this might not be as practical as originally thought. There was general agreement that prodders and dragging/throwing of animals is unacceptable. There was concern that while transporters would follow new rules outside of the truck, they would still pick up/roll stubborn calves inside the truck as the public couldn't see.

Facilities were also identified as a key part of the handling issue. Some attendees thought that facilities must allow calves to be presented at truck height. Phrasing it in this manner would also allow innovation.

If there is a general requirement for loading facilities to be used, the next question is who provides them? There was an overall agreement that farmers wanted to do the right thing, and requiring them to provide the facilities could be achieved in multiple ways at low cost. Participants felt that a regulation to this effect would not be putting an unfair financial burden on farmers. However, some concerns were raised about lifestyle farmers, and whether this was a reasonable obligation to put on them.

There were concerns that requiring transporters to carry the burden of providing walk-on-walk-off facilities by adapting trucks would be unfair. The cost of adapting trucks would be very high, the season is short, and adapted trucks would be unable to use trailers.

It was agreed that if regulations were going to require the provision of loading/ unloading facilities then a transitional period would be required to enable whoever was going to be responsible for those facilities to install them before they could be enforced. How long would be reasonable as a transitional period was not certain.

Issues with handling:

- What is the minimum requirement for loading facilities?
- How do we deal with bobby calves that do not want to move? Are they considered unfit for transport?
- Should it be the farmer or transporter's responsibility to provide the required equipment / facilities?
- Need to educate farmers/transporters on the handling of calves so that they see it is an animal welfare issue, rather than a public perception issue i.e. no "if they can't see it, its fine" mentality.
- How long should any transitional period for facilities be to give people time to install these? If loading facilities are going to be regulated the conversation with farmers and transporters needs to start now to give them time to discuss and adjust.

## MINISTRY FOR PRIMARY INDUSTRIES

### **Animal Welfare Regulations Development Workshop on Bobby Calves Workshop with Advocacy Groups**

*9<sup>th</sup> February 2016, 9.30am – 12.30pm*

*St Andrews on the Terrace, 30 The Terrace, Wellington*

**Attendees:** SAFE, FarmWatch, RNZSPCA, MPI (Policy, Legal and R & A), NAWAC

***Please note: The views and opinions expressed in the notes that follow are a summary of those issues and concerns put forward by attendees at the above workshop. They are not the views of the Ministry for Primary Industries.***

### Overarching themes

Better communication is needed along the supply chain. Farmers, transport operators and processing facility workers need to communicate to ensure that the welfare of bobby calves is cared for at all stages of transport. If an animal is found to be injured in transport this needs to be reported back to the transport driver and the farmer as soon as possible. Likewise with animals that are unfit for transport, if a transport operator will not take some calves due to them being unfit for transport, the farmer should be notified as soon as possible. Communication between all aspects of the supply chain would ensure that the time of last feed would also be noted, so that any regulation on food before slaughter can be enforced.

The call for clear documentation was another key theme throughout the workshop. Attendees thought that a supply chain documentation scheme may relieve a lot of the problems currently seen in bobby calf transport and treatment, and the allocation of responsibility at each stage of the supply chain would lead to self-policing in the industry.

Groups present at the workshop were concerned about how the regulations that are developed are going to be enforced. Advocacy groups were concerned that regulations may not be adhered to unless there was an increase in enforcement. It was suggested that more spot checks and audits could encourage greater levels of compliance, backing up the new sanction of significant fines. The outcome that the groups at the workshop wanted to see was the industry being more self-policing if they realise that enforcement is becoming more serious. Concern was raised that the regulations being developed are to catch lower-level offending, yet regulations will cover the whole industry. It was noted that before any regulations are set in stone there must be a focus on understanding the outliers and working alongside farmers and industry groups, as farmers are already under a significant amount of pressure.

### Shelter

Shelter relates to all stages of a bobby calf's life – on farm/before, during and after transport/at lairage. As these are 3 very different scenarios it may be difficult to develop a single regulation that covers all 3 scenarios satisfactorily. A particular area of concern is bobby calves awaiting collection by trucks, which was highlighted in the FarmWatch and SAFE expose video. There was a consensus that bobby calves are considered very vulnerable animals. The current minimum standards (No. 6 in the Dairy Cattle Code, No. 3 in the Commercial Slaughter Code, No. 2 in the Transport Code) refer to adverse weather conditions, which is a very subjective term. Groups agreed that adverse conditions are usually considered to be severe wind or rain, but it is important that a regulation covers heat and sun as well.



Groups want to see a regulation that covers heat stress, access to bedding, stocking density and clearly defined adverse conditions. Groups agreed that stocking density is an important factor to take into account when assessing shelter. However, it was recognised that there could be benefit in calves huddling together when cold but, conversely, spreading apart when temperatures rise. Shelter is an area that the advocacy groups want to see in regulation, not just covered by minimum standards.

The groups raised some questions and issues about regulating shelter:

- The term 'adverse' is not clearly defined and is context dependent.
- The term 'adequate' needs to be more specific – is it enough to have just adequate shelter?
- 'Heat stress' and 'health problems' may be too broad for this regulation. Animals may be in serious discomfort or distress before showing signs of heat stress or developing health problems.
- Difficulty developing a regulation that can be used universally across the industry, especially taking into account geographical peculiarities. Some areas experience far different climatic conditions than other areas. It is hard to predict how extreme weather may get.

### **Fitness for Transport/Age**

The discussion merged together the topics of 'Fitness for Transport', 'Age of Animals for Transport' and 'Handling of Animals'. It was agreed that an animal's fitness for transport is a very complex issue, and any regulations made must be black and white and easy to determine. The main theme of the discussion was that more communication is needed across the supply chain and a clear delineation of responsibility established at each point along it would probably improve welfare standards.

It was suggested as a solution that at each stage along the supply chain people receiving the animals must sign a document stating that they are fit for transport, as defined by a clear set of criteria. Any unfit animal may therefore be traced back to one stage of the supply chain, and responsibility allocated to that person for supplying an unfit animal. This documentation may allow for bad practice to be reported to enforcement agencies. Along with this documentation, adequate training should be provided for each step along the supply chain on how to treat bobby calves. Some issues surrounding this documentation included:

- If transport operators refused to take animals on the basis that they were unfit for transport, unintended consequences may be seen. Bobby calves may be left outside for hours in collection crates without the farmer realising that some had been left behind.
- There is a grey area in responsibility for animals in change-over. If an animal is injured during loading/unloading, who is responsible for this?

Groups agreed that driving responsibility back down the supply chain may be a non-regulatory option that processing facilities/transport operators can promote, however they believed that a shift in attitude initially needs to be bought about by regulations.

Length of transport was another area of potential regulation that was recognised as being very complex. Groups agreed that a world-wide consensus that length of transport of up to 8 hours from farm to plant is acceptable. Some groups made it clear that transporting animals between north and south island for slaughter is unacceptable. Animals must be processed as quickly as possible when arriving at the plant. It was recognised that the pet food industry sought to process animals within 8 hours. Advocacy groups agreed that a time limit should be assigned to transport of animals, and

that 8 hours was a reasonable timeframe. They also agreed that regulations must cover both the pet food and meat industry as a differentiation between the two is not justified. Vehicles must be suitable for transport.

Loading and unloading facilities were mentioned as an area that could potentially be regulated. Getting animals on and off the truck poses a problem if the correct facilities are not available. Rough handling of bobby calves being thrown into trucks was a serious area of concern discussed in the workshop. In many instances it was agreed that a mismatch between the height of the crate and the height of the truck can lead to calves being thrown into the truck.

A suggested solution was to have ramps or raised pens as mandatory pieces of equipment used to load calves onto a truck. The process of calves getting onto the truck was discussed and it was agreed that it needs to be looked at in more depth. A potential solution was that calves must be able to walk up the ramp on their own, and if an animal refused to walk on their own some clear guidelines be developed for how to get the calf on and off the truck safely.

Some problems with these suggestions were raised:

- Calves may not walk up a ramp on their own, they may be unsure of what they are doing
- Who is responsible for providing the ramp/facilities for loading

The age of a calf before transport was discussed in a lot of depth because it is seen as one of the more contentious issues in calf fitness for transport, and regulating this may cover some of the other issues raised as well. The groups all contended that 4 days old is too young for a calf to be transported. It was recognised that the United Kingdom requires that calves be older before they are transported than is the case in New Zealand. It was suggested that 7 days may be a clear timeframe for farmers before bobby calves are transported. Groups agreed that a minimum age of 7 days may give the farmer more of an incentive to provide a higher standard of care for the calves to raise them to 7 days. There is a wide variation in feeding and growth between 4 and 7 days. A calf at 7 days old may meet more stringent physical fitness criteria, and fewer calves may be injured during transport.

However, this suggestion brought to light potential problems:

- Having a minimum age of 7 days before transport could lead to unintended consequences. Farmers only earn about \$5 a head for bobby calves, and to feed them colostrum for 7 days may cost more than the value of the calf. This could lead to euthanising of bobby calves on farm, rather than sending to the works at 7 days. It was questioned whether it will be more humane to send them through the slaughter system at 4 days old.

A suggestion was made that it may be easier to put a minimum age of 4 days into regulation, making it more enforceable, and have 7 days as a recommended best practice timeframe.

### **Sufficient Food before Transport**

There was a general consensus that feeding 2 hours prior to transport is impractical for farmers. It was agreed that nobody present was an expert on calf nutrition, so any regulations developed should be scientifically justified. Groups agreed that it was unacceptable to keep calves overnight at a processing facility with no food, however allowing calves to be fed at processing facilities may encourage holding calves overnight.

One of the clear outcomes of this discussion was that calves must be processed as quickly as possible when they arrive at the processing facility. It was suggested that a regulation could be developed

that works alongside the time of transport that minimises the time of travel and enforces same day processing unless in exceptional circumstances.

Groups agreed that current minimum standards (Transport Code Minimum Standard 10 (d), Commercial Slaughter Code 4 (j)) that state animals must be fed within 28 hours unless slaughtered was far too long for an animal to be left without food. Animals must not be seriously hungry. After 24 hours calves reach metabolic exhaustion. Groups agreed that 20 hours between last feed and processing should be the maximum amount of time an animal goes without food.

A lot of issues were raised with this suggestion:

- In peak season can we expect calves to be processed within a specific time, and if not then should we expect feeding on premises at processing facility?
- Who is responsible for feeding the calves if they spend over 20 hours without food?
- How do you decide when a calf is showing severe hunger? Calves don't self-regulate their feeding, they will suckle even when they have been fed.
- In peak season, trucks may turn up at unscheduled times, which interferes with the time of last feed for farmers.
- Could MPI Verification Services vets be used to check on animals at a processing facility and ensure they are fed?
- It is difficult to get evidence about when the last feed of a calf was, farmers can adequately prepare calves for transport but cannot account for other industry issues.

### **Blunt Force Trauma in an Emergency**

Groups present did not see regulation in this area as very problematic. They agreed that an animal in pain or distress should be put out of its pain as quickly as possible rather than leaving an animal in pain while getting the appropriate means of euthanasia. Groups agreed with the Dairy Cattle Code of Welfare that blunt force trauma should not be used to kill a calf except in an emergency.

The terminology used in the Dairy Cattle Code was questioned, as groups thought that the terms 'unforeseeable' and 'unexpected' were hard to define.

Induction was mentioned and groups wanted this to be regulated as there was concern that the incidence of it may increase if it is not regulated.