



Animal welfare proposed regulations feedback submission form

Your name: Katie Saunders

Your organisation (if applicable): Veterinarian

Your contact details: s 9(2)(a)

Your feedback: while I welcome the banning of tail docking (or banding) of dogs, a passionate dog breeder at the CHC session raised a good point: why ban docking of some species and not others. While I feel there is probably reasonable justification for tail docking of lambs (although management has played a role in this situation) - it is even more obvious in the tail docking of pigs that this is done due to POOR management of these animals. I would like to see tail docking of pigs remain on the "agenda" as more importantly MANAGEMENT practices around intensive pig farming

Feel free to continue your submission on additional paper and staple it to this form.

Please place your feedback inside the feedback box. Alternatively, take this form with you and post your feedback to Animal Welfare Policy, Ministry for Primary Industries, PO Box 2526, Wellington 6140.

You can also email your feedback to animal.welfaresubmissions@mpi.govt.nz

Submissions close 5pm 19 May 2016.

Any submission you make becomes public information. Anyone can ask for copies of all submissions under the Official Information Act 1982 (OIA). The OIA says we must make the information available unless we have a good reason for withholding it. You can find those grounds in sections 6 and 9 of the OIA. Tell us if you think there are grounds to withhold specific information in your submission. Reasons might include, it's commercially sensitive or it's personal information. However, any decision MPI makes to withhold information can be reviewed by the Ombudsman, who may require the information be released.

as a vet in clinical practice for 15yrs I could count on one hand the tail & dew claw injuries I have seen. further;

s 9(2)(a)

From: "paul hellings" s 9(2)(a)
Date: Tuesday, 3 May 2016 4:21 p.m.
To: s 9(2)(a)
Subject: please print

Interestingly this document acknowledges the fact that most NZer's take animal welfare seriously and look after their animals well both by our laws and our good conscience. And that these proposals penalise the majority for the minority of offenders. Sadly there will always be law breakers that is impossible to legislate for.

So What has changed in the last 4 years that now there is a move to have tail docking banned given that the AW act of 2010 has a QA provisions for NZCDBA accredited bander's which is based on the deer antlers harvesting group QA guidelines and given that this scheme has worked so well why are MPI choosing to throw it out and have proposed separate legislation for dogs compared to pigs and lambs. Have the NZCDB not done a good enough job given there have been no complaints compared to the

The reasoning against tail docking for dogs is biased as the tail is only one cue and not a primary cue for communication, scent is first followed by body language from the front to the rear accompanied by audible communications (abranter, yin, grandin, rugaas to name a few).

Reasoning a lack of tail damage presented to vet clinics. Definition of tail damage must surely include bruising, spinal alteration, followed by arthritis or fusion(calcification, spondylosis) from injury that goes un noticed and unreported and undiagnosed or diagnosed too late when the dog is in pain. All of which are avoided by tail docking and is never seen in traditionally docked breeds which is probably why it is in breed standards. Example my breed the boxer, its original standard "a splendid companion and good room, house or estate dog". I have certainly had first hand experience of tail damage in tailed breeds and torn dew claws from poor skills by vets and tail probs from vet docking procedures plus witnessed those with my breed yelping in discomfort from whacking their tails on household structures and household items.

and why is it that the uk are looking into research to recind their current legislation on prohibition of docking traditionally docked dogs.

Once again NZ is following on 20 years behind the times

Approved tail docking by a layman for pigs and lambs is also prophylactic procedure and considered a non surgical procedure to prevent tail damage as it reduces time, labour and medical costs as well as pain and suffering. As breeders of dogs are obliged to adhere to the fair trading act and consumer protection act the docking of traditional docked dogs is relevant to both these acts,

unnecessary costs to the consumer should a problem arise.

I note that the NZVA are happy to support this but not for dogs and they have banned their members from doing so for dogs. Are they going to do the same for pigs and lambs and if not have they and MPI considered the legal ramifications under NZ's constitution, laws and TOW.


It certainly is a contradiction of their hypocritical oath "to do no harm" given that lambs CNS is totally active from birth as they are prey animals and pigs have a similar CNS maturation to dogs

*Therefore shouldn't all tail banding proposals be the same for all species. Is there any reason why MPI shouldn't remain with the status quo for tail docking of dogs which is in line with the new proposals for pigs and lambs.

Are MPI with these proposed legislations agreeing to compliance costs (indirect taxes) from countries we export to who are protecting their local industries mainly the EEC and USA and to the emotions of the animal welfare activists who would argue that man shouldn't have any type of connection with animals

Sentience as a holistic approach "not just one that is free from suffering" and also I note that most of the countries listed that have put in to law animals are sentient are mainly the EEC countries.

Paul Hellings
IMA Boxers
s 9(2)(a)



9-5-2016

Paul Hellings

s 9(2)(a)

Re: Animal Welfare Regulations Submission

Introduction

1. The purpose of this submission is to comment on proposed Animal Welfare Regulations. The Ministry for Primary Industries (MPI) seeks feedback on proposed regulations intended to improve the current animal welfare system.
2. This submission is made by Paul Hellings

The following organisation support this submission

New Zealand Council of Docked Breeds (NZCDB)

3. The contact person for this submission is:

Name: Paul Hellings

Address: s 9(2)(a)

Contact Phone: s 9(2)(a)

Email: s 9(2)(a)

General Comments

Interestingly this document acknowledges the fact that most NZer's take animal welfare seriously and look after their animals well both by our laws and our good conscience. And that these proposals penalise the majority for the minority of offenders. Sadly there will always be law breakers that is impossible to legislate for.

So What has changed in the last 4 years that now there is a move to have tail banding banned for dogs given that the AW act of 2010 has a QA provisions for NZCDBA accredited bander's which is based on the deer antlers harvesting

group QA guidelines and given that this scheme has worked so well why are MPI choosing to throw it out and have proposed separate legislation (items 62, 70 and 81 proposed legislation changes) for dogs compared to pigs and lambs. Have the NZCDB not done a good enough job given there have been no complaints compared to the SPCA and NZVA.

The reasoning against tail banding for dogs is biased as the tail is only one cue and not a primary cue for communication, scent is first followed by body language from the front to the rear accompanied by audible communications (Dr's abramantes, yin, grandin, rugaas, dunbar to name a few).

Reasoning of a lack of tail damage presented to vet clinics. Of course there is none from traditionally banded dogs. Definition of tail damage must surely include bruising, spinal alteration, followed by arthritis or fusion (calcification, spondylosis) from injury that goes unnoticed and unreported and undiagnosed or diagnosed too late when the dog is in pain. All of which are avoided by tail banding (before 4 days of age, minimum standard #17 Animal Welfare Dogs Code of Welfare 2010) and is never seen in traditionally banded breeds which is probably why it is in breed standards. Example my breed the boxer, its original German Standard circa 1902 standard "a splendid companion and good room, house or estate dog". I have certainly had first hand experience of tail damage in tailed breeds and torn dew claws from poor skills by vets and tail probs from vet docking procedures plus witnessed (as an obedience instructor for boxers for the SI boxer club '98-2000) for those with my breed whose boxers were yelping in discomfort from whacking their tails on household structures and household items. I have raw feed, shown and worked my docked and dew claw removed boxers since 1993 and they have had no problems with communicating or balance in dog sports or working as guide dogs or holding on to bones etc.

The UK are looking into research to resind their current legislation on prohibition of banding traditionally banded dogs.

Under this proposed legislation, Approved tail banding by a layman for pigs (under 7 days item 81) and lambs (under 6 months item 70) is also a prophylactic (convenience and for pecuniary gains for farmers, sellers, NZVA and Govt taxes) procedure and considered a non surgical procedure to prevent tail damage as it reduces time, labour and medical costs as well as pain and suffering is acceptable but prophylactic for dogs by preventing damage and pain is not?. Given banding is considered a non surgical procedure under this proposed legislation for lambs and pigs and castration for cows, lambs and pigs by definition of allowance for these other species, then so it must be for banding traditionally banded dogs.

As breeders of dogs are obliged to adhere to the fair trading act and consumer protection act (copies attached noting fit for purpose and acceptable quality) the banding of traditional banded dogs is relevant to both these acts, unnessessary costs to the consumer should a problem arise and therefore goods not fit for purpose.

I note that the NZVA are happy to support this legislation of banding of lambs but not for dogs and that they have banned their members from doing so for dogs. Are they going to do the same for pigs and lambs and if not have they and MPI considered the legal ramifications under NZ's constitution, rules of law which is discriminatory under the Bill of Rights act 1990, The Human Rights act 1993 and TOW by separating dogs from sheep and pigs with their tail banding allowance.

It certainly is a contradiction of their hypocritical oath "to do no harm" and the scientific evidence supporting these legislative changes given that lambs CNS is totally active from birth as they are prey animals and pigs have a similar CNS maturation to dogs of up to 7-10 days. Refer to NZCDB re scientific evidence. Therefore shouldn't all tail banding proposals be the same/equal for all species

Are MPI with these proposed legislations agreeing to increasing compliance costs (indirect taxes) from countries we export to who are protecting their local industries mainly the EEC and USA and to the emotions of the animal welfare activists who would argue that man shouldn't have any type of connection with animals or is it to bring NZ Animal Welfare in line with The NZ Veterinary act of 2005, the NZVA's code of conduct or the World Organisation for Animal Health's principles, if so the legislation requirements should be the same for all species.

Sentience as a holistic approach "not just one that is free from suffering" and also I note that most of the countries listed as reference that have put in to law animals are sentient are mainly the EEC countries. The cost of doing business with them = compliance/indirect taxes on our exports.

I respectfully suggest that the status quo(3.4.1 options under the proposal) remain for tail banding of dogs which is in line with the new proposals for pigs and lambs and and just have the penalties added to the existing legislation.

Conclusion

4. Our organisation seeks both appropriate care and equal welfare standards for all animals including dogs. We however consider that the proposals as set out may have other unintended implications which in and of themselves will not meet the intent or care standards proposed. We suggest that as long standing dog breeders we and our members will be well placed to assist officials and at the very least should not be ignored.
5. We welcome any questions the Ministry may have with respect to this submission. We are available also to meet should this be helpful.

Sign off



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the proposals could potentially have on more general issues such as the costs they might generate, business processes that may need to be adapted and any unintended consequences that could arise (see the general questions in sections 9.1, 10.1 and 12.1).

2.1 REVIEW OF ANIMAL WELFARE ACT 1999

The Act was reviewed during 2011/12 to ensure that New Zealand's animal welfare system was fit for purpose.

As a result of the review, the Amendment Act was developed and passed into law on 9 May 2015. The fundamental principles of the Act have not changed. There is still an obligation on all New Zealanders to provide for the welfare of animals in their care by attending to their physical, health and behavioural needs.

The Amendment Act made changes to the Act to improve the enforceability, clarity and transparency of New Zealand's animal welfare system. Some changes to the Act came into force immediately (see section 2.2). Some changes have a delayed commencement date as they will only work well once regulations are implemented (see section 2.3). It is proposed that these changes will come into force with the proposed regulations in this document.

2.2 CURRENT REGIME

This section describes the current regime, including all the provisions of the Amendment Act that have been brought into force.

Parts 1 and 2 of the Act set out obligations for the care of, and conduct towards, animals. For example, the Act obliges the owner, or the person in charge, of an animal to ensure that the physical, health and behavioural needs of the animal are met in accordance with good practice and scientific knowledge. What constitutes a physical, health or behavioural need is determined by, in each case, what is appropriate to the species, environment, and circumstances of the animal.

The definition of 'physical, health and behavioural needs' is based on what is referred to internationally as the 'five freedoms'. These freedoms provide for:

- proper and sufficient food and water;
- adequate shelter;
- the opportunity to display normal patterns of behaviour;
- appropriate physical handling; and
- protection from, and rapid diagnosis of, injury and disease.

The Act also obliges the owner or the person in charge of an ill or injured animal to ensure that the animal receives treatment to alleviate any unreasonable or unnecessary pain or distress. A person commits an offence if they fail to comply with these obligations or kill an animal in a manner that causes it to suffer unreasonable or unnecessary pain or distress.

The Act provides for the care of animals during surgical and painful procedures by placing restrictions on the procedures that may be performed on them. Only veterinarians, or veterinary students working under supervision, can perform significant surgical procedures on animals unless exceptions are provided for in regulations.

The Act does not expand on the care and conduct obligations set out in Parts 1 and 2. The detailed requirements and specific actions that need to be taken to meet these obligations are set out as minimum standards in codes of welfare.

Currently 18 codes of welfare are in force⁵. The codes of welfare are made by the Minister for Primary Industries on the recommendation of the National Animal Welfare Advisory Committee (NAWAC).

The Act is primarily enforced by MPI and the Royal New Zealand Society for the Prevention of Cruelty to Animals (RNZSPCA)⁶. MPI primarily focuses on production (farm) animal welfare issues while the RNZSPCA focuses on urban areas and on companion (pet) animal welfare issues. There is degree of crossover, particularly in animal welfare issues on 'lifestyle' properties. The RNZSPCA investigates around 13,000 complaints a year mainly relating to companion animals. MPI investigates around 1,300 complaints per year mainly relating to production animals.

The New Zealand Police (the Police) also have the power to enforce the Act. The Police prosecute a couple of hundred cases per year that have an animal welfare element. However, in most cases they will refer animal welfare issues to the RNZSPCA or MPI.

2.2.1 New powers to make regulations

The Act now has powers to make regulations in relation to:

- standards for the care of, and conduct towards, an animal (section 183A of the Act); and
- surgical and painful procedures (section 183B of the Act).

The proposed regulations will complement codes of welfare by specifying directly enforceable animal welfare standards and providing clarity around the performance of surgical and painful procedures. The proposed regulations will also set lower-level penalties for breaches of these standards and requirements. Penalties can either be a fine and criminal conviction as a result of a prosecution under the regulations or an infringement fee without conviction.

Before recommending that surgical and painful procedures regulations be made, the Minister must have regard to whether the procedure fits the criteria for determining whether it is a significant surgical procedure (set out in Box 1 on page 8) and also:

- the purpose of the procedure;
- the extent (if any) to which the procedure is established in New Zealand;
- good practice in relation to the use of the procedure for animal management purposes or in relation to the production of animal products or commercial products;
- the likelihood of the procedure being managed adequately by codes of welfare or other instruments under this Act; and
- any other matter the Minister considers relevant.

⁵ The 18 codes of welfare are listed in Appendix 2. The full codes of welfare can be read on the MPI website <https://www.mpi.govt.nz/protection-and-response/animal-welfare/codes-of-welfare/>

⁶ RNZSPCA is the only approved organisation under section 121 of the Act. This allows them to have animal welfare inspectors who can enforce the Act.

2.2.2 Introduction of Compliance Notices

The Act now allows animal welfare inspectors to issue Compliance Notices, which are designed to be an early intervention tool. For example, under Part 7 of the Act an inspector may issue a Compliance Notice to a person to stop doing something, or prohibit them from doing something, if they have good cause to suspect that something the person is doing contravenes or is likely to contravene the Act or any regulations made under it. A Compliance Notice may also be issued to require a person to do something that the inspector reasonably believes is necessary to ensure that the person complies with the Act or any regulations made under it. Section 2.3.2 discusses the proposed infringement fee for Compliance Notices.

2.2.3 New powers to make transitional regulations

The Act enables the Minister to make transitional standards and requirements under regulations. Transitional standards or requirements allow a particular practice, which does not fully meet the obligations of the Act, to continue for a limited time to enable a transition from current practice to a new practice that is compliant with the Act.

Previously, minimum standards in codes of welfare managed transitional practices. The power to create transitional minimum standards has been revoked. Section 183A of the Act now sets out more transparent and explicit considerations for creating transitional regulations. The Act also differentiates between:

- transitions (where there is a requirement to change practice within a specific time period); and
- exemptions (where a practice is expected to continue indefinitely although these are still subject to periodic review).

The Act sets a maximum time period for transitions so that they cannot last indefinitely. The transition period is limited to a period that does not exceed 10 years, with an additional period of up to five years in very limited circumstances. Exemptions can only be provided for religious or cultural practices.

The use of regulations will make transitional standards and requirements more enforceable if they are breached. The regulatory proposals relating to the transition away from using conventional layer hen cages is an example of a transitional regulation.

2.3 CHANGES TO THE ACT NOT YET IN FORCE

It is proposed that some changes to the Act be brought into force, by Order in Council, with the proposed regulations in this document. Unless otherwise provided for these changes will come into force in 2020.

These changes primarily relate to revising the existing regulatory regime for managing surgical and painful procedures (see section 2.3.1) or attaching an infringement fee for breaching a Compliance Notice (see section 2.3.2). Detail of the technical changes to be brought into force can be found in Appendix 3.

2.3.1 Changes to the regime for surgical and painful procedures

The Amendment Act repeals the existing regime for surgical and painful procedures. The existing regime consists of a tiered classification system for different procedures and some

specific prohibitions and offences⁷. It is proposed that the provisions in the Act, relating to the existing system, be removed by Order in Council with the proposed regulations in late 2016.

Requirements that significant surgical procedures can only be undertaken by a veterinarian, or a veterinary student acting under the direct supervision of a veterinarian, will remain (section 15 of the Act) although exceptions will be able to be provided in the regulations. In addition, it is proposed that the Amendment Act's criteria for determining whether a procedure is a significant surgical procedure be brought into force as part of this regulatory package (see Box 1 below).

Box 1: Section 16 of the Act—Criteria to determine whether a procedure is a significant surgical procedure (not yet in force)

If any person has to determine whether a procedure carried out on an animal is a significant surgical procedure under this Act, the person must determine the question by considering the following criteria:

- (a) whether the procedure has the potential to—
 - (i) cause significant pain or distress; or
 - (ii) cause serious or lasting harm, or loss of function, if not carried out by a veterinarian in accordance with recognised professional standards; and
- (b) the nature of the procedure, including whether this involves—
 - (i) a surgical or operative procedure below the surface of the skin, mucous membranes, or teeth or below the gingival margin; or
 - (ii) physical interference with sensitive soft tissue or bone structure; or
 - (iii) significant loss of tissue or loss of significant tissue.

2.3.2 Compliance Notice infringements

The amendments associated with section 2 and section 156I of the Act relate to attaching infringement offences and penalties to Compliance Notices to enhance their effectiveness.

It is proposed that the fee for the infringement offence associated with non-compliance with a Compliance Notice (section 156I (1)) be set at \$500. The level of the proposed infringement fee reflects the fact that by the time an infringement offence occurs the owner or person in charge of the animal has:

- already been informed that their practice does not comply with Act or regulatory requirements (i.e. they have been issued with a Compliance Notice);
- been provided with time to rectify the situation; and
- failed to do so.

If an animal is suffering as a result of the non-compliance with a Compliance Notice, offences under the Act or regulation offences could also be available in addition to an infringement fee.

⁷ The existing regime for surgical and painful procedures includes:

- a tiered classification system for surgical procedures— significant, restricted and controlled procedures (sections 15 to 21 of the Act); and
- prohibiting the cropping of the ear of a dog and blistering, firing or nicking a horse (section 21(2) of the Act); and
- specifying that piercing the tongue of an animal and branding an animal in such a manner that the animal suffers unreasonable and unnecessary pain or distress are both ill-treatment offences (section 29 (b) and (f)).

2.3.3 Other changes

Section 36(3) of the Act specifies an infringement offence for failing to inspect a set trap within 12 hours. However, no infringement fee is set for this offence. It is proposed to set the infringement fee at \$300 via a regulation made under section 183 of the Act.

Question 1: Is there any reason why changes to the Act not yet in force, should not be brought into force at the same time as the regulations (rather than waiting for them to automatically commence in 2020)?

Question 2: Are the infringement fees proposed for sections 156I and 36(3) appropriate?

3.0 The Proposed Regulatory Package

3.1 WHY ARE REGULATIONS NEEDED?

The review of the Act identified problems that could best be addressed by regulation. Regulations are also needed to update standards for some existing practices to reflect scientific knowledge and good practice.

MPI has developed this package of proposed regulations because they are the first substantial suit of regulations ever made under the Act. It is envisaged that NAWAC will play a key role in recommending future regulations, for example, as part of its ongoing role in developing and revising codes of welfare.

3.1.1 To respond to problems identified with the operation of the Act

The 2011/12 review of the Act identified problems with the enforceability, clarity and transparency of the Act⁸. Analysis of different options during the development of the Amendment Act determined that regulations would best address many of the problems related to enforceability or clarity. The Amendment Act provided new powers for regulations that could made to complement the Act and the minimum standards within codes of welfare.

Enforceability

The Act review identified two enforceability problems best addressed by regulations:

- codes of welfare are not directly enforceable; and
- there are limited enforcement tools for dealing with low to medium offending.

Codes of welfare contain minimum standards for the care of animals, however they do not have the status of primary or secondary legislation. They are 'deemed' regulations and have no offences attached to them. A breach of a minimum standard in a code of welfare is not an offence in itself. However, breaching a minimum standard can be put forward as evidence in a prosecution and adherence to a minimum standard can be relied on as a defence for an offence against some provisions of the Act.

⁸ For further information see "Options to Amend the Animal Welfare Act 1999: Regulatory Impact Statement". (2013). <http://www.treasury.govt.nz/publications/informationreleases/ris/pdfs/ris-mpi-oawa-may13.pdf>.

3.1.2 To update current practice

Most of the proposed regulations outlined in this document are based on the existing minimum standards within codes of welfare and do not represent a significant change in requirements although, of course, some changes are involved. However, during the development of the proposed regulations the question of whether the standards for particular practices needed to be updated was considered.

The minimum standards within codes of welfare reflect good practice, scientific knowledge, and available technology at the time when they were developed.

The proposals that update practice, beyond minor changes, primarily relate to the performance of surgical and painful procedures and the management of young calves. For a more thorough explanation of the changes refer to the specific proposals outlined in section 11.4 and 12.4 of this document.

3.2 OBJECTIVES

The Amendment Act enables regulations to be made that will address identified problems related to enforceability and clarity. The overarching objective of the regulatory proposals in this document is to make regulations that will deal effectively with these problems.

We will know that the regulations have been successful when:

- there is a higher level of compliance with animal welfare standards;
- there are fewer instances where an animal's physical, health and behavioural needs are not met;
- transitional standards are clear and able to be enforced;
- the requirements for surgical and painful procedures reflect good practice, therefore, there is a reduction of unreasonable and unnecessary pain and distress to animals in the performance of surgical and painful procedures;
- there is greater clarity about who is able to undertake certain procedures and those people know what they are allowed or not allowed to do in the performance of a procedure; and
- the world leading reputation of New Zealand's animal welfare regulatory system is maintained and enhanced.

3.3 THE PROCESS

The following criteria were used to determine which of the minimum standards and additional matters would be appropriate to consider developing into regulations.

- Effective – is there an identified problem? Is it likely that regulations will achieve the desired change in outcomes and/or update practice where necessary?
- Efficient – if the regulations set a higher standard than the current minimum standards they should be the minimum necessary to ensure that the purpose of the Act will be met, be practical and economically viable.
- Equitable – the level of the offence is proportionate to the lower level penalties that are available under regulation.
- Clear – the actions or omissions are specific and measurable. Regulations need to be clear and precise so there is no doubt when an offence is committed. This is especially

so for infringement offences as they are intended to quickly and efficiently deal with minor offending. This value is lost if they are too open to challenge.

Around 1200 minimum standards or requirements were considered against the criteria above, and the options discussed in section 3.4. The vast majority were judged to not require, or, not be suitable for, regulation at this time. For reasons of brevity these are not presented in this document, although examples are given below and in section 3.4.

The regulatory proposals in Part B are those that met the criteria above. A number of questions about suitability, or information gaps still exist around some proposals. MPI is consulting in the expectation that people affected by the proposals will provide further information to help determine if a proposed regulation is likely to be efficient, effective, equitable, clear, and achieve its objective.

In developing these proposals MPI drew on the knowledge and experience of a joint working group⁹ and targeted stakeholder workshops. The purpose of this approach was to provide expertise and practical knowledge about specific animal husbandry practices, and to incorporate aspects of the usual code of welfare development process that stakeholders and the public are familiar with and expect.

The joint working group reviewed the minimum standards in all of the codes of welfare¹⁰ (and draft codes). In addition some matters were identified that were not covered, or not adequately covered, by minimum standards and were included within the review.

In late 2015 and early 2016 the Chair of NAWAC and MPI undertook a series of targeted workshops and meetings with stakeholders to test the areas being considered for potential regulation. Issues considered included whether problems exist in the area, the magnitude of any problems, and the practicality and feasibility of the proposals.

MPI analysed the information collected and identified the areas, set out in Part B of this document, where regulation is considered the most appropriate mechanism to address the issues raised by the Act review. Some other matters may need to be considered for regulation in future but further work is necessary to understand the full implications of progressing regulations for these areas. Examples include:

- *Animals with low body condition.* Condition can be a subjective measure and, in addition, different levels of condition are acceptable between species, situations, and seasons; and
- *Selective breeding.* Selecting for inherited traits that are seen as desirable, whether that be for increased production, efficiency of feed conversion or the way an animal looks, may result in unintended or undesirable consequences. Examples include: negative fertility traits associated with some dairy cow positive milk production traits; or congenital airway obstruction found in brachycephalic breeds of dog.

⁹ The joint working group consisted of representatives from NAWAC, MPI, RNZSPCA and the Veterinary Council of New Zealand.

¹⁰

3.4 OPTIONS

Each minimum standard or additional matter was assessed to determine whether it should be retained in its current form (Option 1), regulated (Option 2) or addressed through non-regulatory mechanisms (Option 3).

3.4.1 Option 1: Retaining the status quo

This option recognises that it is neither necessary nor appropriate to put regulations in place for all areas covered by the existing minimum standards or the additional areas considered. Regulations should only be considered if they are the appropriate mechanism to address a specific problem and the regulatory penalties available are proportionate to the level of offending. More severe omissions or actions will, and should, continue to be addressed via the offence provisions under the Act and associated higher penalties. For further information on the regulatory penalties available refer to Table 2.

Two examples where a code of welfare or the Act are considered more appropriate than regulations are:

1. *Animal cruelty*

Ill-treatment of an animal is sufficiently severe to warrant prosecution under the Act which carries maximum penalties, including up to five years imprisonment for wilful ill-treatment. The penalties available under regulation are not proportionate to the offending. It would not be equitable to downgrade this offending from Act level to regulation. Examples of this kind of ill-treatment could include breaking a cow's tail or torturing a cat.

2. *Stockmanship*

Most codes of welfare contain minimum standards stipulating that animals must be cared for by a sufficient number of knowledgeable and competent personnel. These work well as minimum standards but present difficulties for regulations as they can be met in many ways. This makes it difficult to clearly prescribe the specific act or omission in regulation.

In considering the proposals set out in Part B:

Question 3: Are there any minimum standards or additional matters you think should become regulations immediately, which are not included in the regulatory proposals in Part B?

Questions 4: Are there any minimum standards or additional matters that you think should be considered for regulation in the future, once the implications of regulating these areas are better understood?

3.4.2 Option 2: Developing regulations

MPI consider that the proposed regulations, set out in Part B of this document, meet the criteria identified in section 3.3.

4.1.5 Defences

The ability of the defendant to raise a defence is important to mitigate any possible injustice that may result in strict liability offences.

It is proposed that the following defences be made available to a defendant to prove on the balance of probabilities:

- the defendant took all reasonable steps to comply with the relevant provision; or
- the act or omission constituting the offence took place in circumstances of stress or emergency and was necessary for the preservation, protection, or maintenance of human life.

Question 12: What defences do you think should be available if the proposed regulations are breached and why?

Question 13: Would it be appropriate to expand the second defence above to include “...*necessary for the preservation, protection, or maintenance of human or animal life.*”? If so, in what circumstances, and which regulatory proposals would this apply to?

5.0 Implementation

5.1 WHEN DO THE REGULATIONS COME INTO FORCE?

It is anticipated that most regulations will come be made by 2016. However, we will be considering the extent to which any regulatory proposals for young calves can be implemented by late July 2016 (the spring bobby calf season).

Across all of the regulatory proposals, we will also consider whether, in order to provide people with a reasonable period of time to change their practice, some proposals would benefit from an extended lead-in time before coming into force.

Question 14: Do any of the proposed regulations, set out in Part B, require a lead-in period? If so what period is reasonable? Are there any other challenges relating to the timing of regulations coming into force?

5.2 WHAT HAPPENS TO THE EXISTING MINIMUM STANDARDS/ REQUIREMENTS?

It is important to ensure that the proposed regulations, the codes of welfare, and the Act continue to work together to regulate animal welfare effectively. The Act sets the high level animal welfare obligations, and sets offences for the most severe offending. Codes of welfare remain important for setting minimum standards and for their evidential role in the prosecution of Act level offences. Adherence to, or breaching, a minimum standard can be used as evidence to support or defend a prosecution against an Act offence. However it is not

intended that adhering to a code be allowed as a defence for the strict liability offences in the regulations (see section 4.1.5).

Many of the proposed regulations are based on the codes of welfare. Amendments to the codes of welfare can be made by regulation under section 183A of the Act. It is intended that the proposed regulations will include some amendments to the codes of welfare. However, until the final proposals have been determined, following consultation, the extent of any required amendments to minimum standards within codes is unknown.

Where existing minimum standards overlap with proposed regulations, or where other changes are necessary to make them work effectively in the legislative scheme, the minimum standards may need to be amended. For matters dealt within transitional standards under regulations it is proposed that minimum standards dealing with these matters are revoked to allow section 183A(11) of the Act to have effect.

For other matters there are two different approaches possible. The first approach is that the codes of welfare will be amended in one, or a combination, of the following ways:

- where a minimum standard is lifted into regulation without extensive alteration, the minimum standard will be revoked to avoid duplication; and/or
- where a regulation contains a higher standard than a minimum standard the minimum standard will be revoked or amended to avoid contradiction; and/or
- where a regulation is more specific than a minimum standard then the minimum standard may remain in place in order to capture the wider intent.

The second approach is that the codes of welfare would be amended only where the regulations provide a higher standard in order to align the minimum standards in the codes with this higher standard. This would mean that the codes of welfare would continue to operate to a fuller extent in their evidential and defence functions in prosecutions for Act offences.

Question 15: How should the codes of welfare be amended by the proposed regulations to ensure the codes continue to work effectively within the legislative scheme?

Question 16: Which of the approaches as outlined above, or combination of approaches do you support?

Question 17: What other options to amend the codes are there?

5.3 HOW ARE THE REGULATIONS GOING TO BE ENFORCED?

MPI shares responsibility for animal welfare enforcement with the RNZSPCA. The RNZSPCA is the only "approved organisation" under the Animal Welfare Act, and has its own MPI-appointed animal welfare inspectors. The New Zealand Police are also deemed to be animal welfare inspectors although typically their involvement is limited to where animal welfare offending is connected to other crimes. Farm animal complaints are predominantly handled by MPI, while companion animal complaints are predominantly handled by the RNZSPCA.

Current state	<p>Minimum Standard 19 – Aids for Behavioural Modification</p> <p>(b) Pinch or prong collars must not be used</p> <p>Code definition of ‘Pinch or prong collar’ – “A chain made of metal or hardened plastic links with prongs positioned against the neck on each link.”</p>
What is the problem?	<p>If misused, pinch and prong collars can cause pain and distress. Prohibitions in codes of welfare are not directly enforceable (see discussion in section 3.1.1).</p> <p>Despite prohibition in the Dogs code of welfare, New Zealand businesses still sell pinch and prong collars.</p>
How will regulation help?	Placing the prohibition in regulation means it will be directly enforceable.
Penalty	Proposed infringement offence with a fee of \$300. No criminal conviction.
Additional questions and information	<p>Refer to the general questions set out in section 9.1 and 10.1.</p> <p>In addition, please also consider the following questions:</p> <p>Are there legitimate uses for pinch and prong collars where the risk of harm/misuse is outweighed and could be managed?</p> <p>Dogs used in law enforcement or the defence forces are chosen for their particular temperamental qualities and require highly specialised training. Dog training in these forces is based on positive reinforcement; however, on occasion a particular dog’s temperament may require additional tools. Would it be appropriate to allow skilled trainers in the law enforcement and defence forces to have access to pinch and prong collars?</p> <p>Is the definition sufficient to capture all types of pinch and prong collars while not capturing other collars or devices?</p> <p>Should the sale of pinch and prong collars also be prohibited?</p> <p>If so, one mechanism to do so would be to declare it a prohibited device under section 32 of the Act. The associated penalties in the Act are up to 12 months imprisonment or a fine of up to \$50,000 for an individual or a fine of up to \$250,000 for a body corporate. Would these penalties be proportionate?</p> <p>The use of pinch and prong collars does not necessarily cause pain and distress, but the risk that they do is high. If unnecessary or unreasonable pain and distress were caused this would still be able to be prosecuted as ill-treatment under the Act.</p>

5. Dogs – Injuries from collars or tethers

Proposal	<p>Use of a collar, and/or a tether, must not cause cuts, abrasions, swelling, restrict breathing or panting.</p> <p>Links to goat and horse tethering, links to dog muzzling, access to shade and dry sleeping quarters, and heat stress in vehicles.</p>
Current state	<p>Minimum Standard 4 – Containment and Tethering</p> <p>(a) Dogs must not be contained or tethered in a way that causes them injury or distress.</p>

	(b) Collars must fit comfortably without damaging the skin or restricting breathing.
What is the problem?	If misused, a collar or tether can cause pain and distress. An identified area of frequent non-compliance. On average 95 tethered dog complaints are investigated per year. Current enforcement responses are inappropriate for frequent offending. Injury and distress has to be severe before prosecution under the Act.
How will regulation help?	Will provide an enforcement response proportionate to the offence. Will clarify that injuries or distress caused by inappropriate collars and tethering is unacceptable.
Penalty	Proposed infringement offence with a fee of \$300. No criminal conviction.
Additional questions and information	Refer to the general questions set out in section 9.1 and 10.1. In addition, please also consider the following questions: Are the restrictions (must not cause cuts, abrasions, swelling, restrict breathing or panting) at the right level? Should there be other restrictions such as 'must not prevent drinking', or fewer restrictions? Would it be appropriate for this regulation to cover all species restrained by a collar or tether?

6. Dogs – Muzzling a dog	
Proposal	Muzzling a dog must not cause cuts, abrasions, swelling, or restrict breathing and must allow panting.
Current state	<i>Minimum Standard 19 – Aids for Behavioural Modification</i> (c) Muzzles must fit comfortably without chafing the skin or impeding breathing and must allow the dog to open its mouth sufficiently to enable panting or drinking.
What is the problem?	If misused, a muzzle can cause pain and distress. An identified area of non-compliance. It is estimated from available data that there are around 10-20 complaints per year relating to dog injuries from muzzles. Current enforcement responses are inappropriate for offending. Injury and distress has to be severe before prosecution under the Act.
How will regulation help?	Regulation will provide an appropriate and enforceable tool for addressing low-level non-compliance.
Penalty	Proposed infringement offence with a fee of \$300. No criminal conviction.
Additional questions and information	Refer to the general questions set out in section 9.1 and 10.1. In addition, please also consider the following questions: Should the regulation also specify that the dog must be able to drink? Are there legitimate times when a dog should be muzzled in such a way it cannot pant or drink?

Regulatory proposals relating to surgical and painful procedures are intended to primarily provide greater clarity and update standards to reflect good practice and scientific knowledge (see section 3.1.1).

12.3 UPDATING CURRENT PRACTICE

The PHP code of welfare governs the majority of surgical and painful procedures. In 2005 when the code was issued, NAWAC acknowledged that there was a need to continue efforts to minimise pain and distress associated with the husbandry procedures described in the code²⁵, including wider use of pain relief. It encouraged operators and industries to further develop management systems and breeding programmes which removed the need to routinely perform these types of procedures²⁶.

Consideration of whether the obligations relating to surgical and painful procedures need to be updated reflects the fact that the PHP code of welfare is now over 10 years old. It also reflects the fact that the PHP code of welfare was made under a statutory regime that has now been amended (see section 2.3.1).

When making regulations relating to surgical and painful procedures the Minister must have regard to factors that were not necessarily considered in the making of the PHP code of welfare. These include:

- whether the procedure fits the criteria for determining whether it is a significant surgical procedure (see Box 1 on page 8);
- the purpose of the procedure;
- the extent (if any) to which the procedure is established in New Zealand;
- good practice in relation to the use of the procedure for animal management purposes or in relation to the production of animal products or commercial products;

In light of the points above, consideration was given to:

- whether it was appropriate to consider the wider use of pain relief at this time;
- how and why a procedure is currently performed and whether it reflects good practice, for example, is it necessary or reasonable given changes in scientific knowledge; and
- the wider involvement of veterinarians.

Considering the factors above greater use of pain relief or veterinarian oversight has been proposed for some procedures. However, for some routine husbandry procedures current practice is considered appropriate given the balance between animal management and the pain experienced by the animal. Pain relief and veterinarian oversight is not proposed for docking of sheep, and castration of sheep and cattle, under 6 months when using approved methods.

Pain relief at the time of the procedure

There is a growing understanding worldwide of the nature of pain caused by routine procedures, and of the nature of pain in different animals of different ages.

During the development of the PHP code of welfare, NAWAC noted its intention to consider making pain relief, within defined periods, a requirement for a wider range of procedures in any review of the code²⁷.

²⁵ PHP code of welfare - <https://www.mpi.govt.nz/protection-and-response/animal-welfare/codes-of-welfare/>

²⁶ Report on the PHP code of welfare - <https://www.mpi.govt.nz/protection-and-response/animal-welfare/codes-of-welfare/>

²⁷ Report on the PHP code of welfare <https://www.mpi.govt.nz/protection-and-response/animal-welfare/codes-of-welfare/>

NAWAC held a workshop in 2006 to identify barriers to the wider use of pain relief. A number of criteria, including simplicity of use, were recognised as preventing wider use of pain relief at the time. Other barriers noted were:

- the availability, safety and efficacy of pain relieving drugs;
- practical and economic aspects determining the use of pain relieving drugs;
- attitudes and expectations towards minimising pain associated with painful husbandry procedures, and the equitable distribution of the costs and benefits of doing so; and
- the regulatory environment required to support the use of restricted drugs.

Since the issue of the PHP code of welfare and the outcomes of the 2006 workshop on pain relief, scientific knowledge and good practice have moved on. There is research showing that effective pain relief can be provided during many routine husbandry procedures, and the means to provide pain relief are available to farmers and animal owners (see Box 2 below).

Box 2: Pain relief

What is pain relief?

For the regulatory proposals in this document the proposed definition of pain relief is:

- *throughout the performance of the surgical procedure, an animal must be under the influence of a general or local anaesthetic that is sufficient to prevent the animal from feeling pain.*

While it is only proposed that pain at the time of the procedure be regulated, ongoing pain mitigation after the procedure has been conducted is also important. Consideration should be given to means to alleviate or minimise any ongoing discomfort, pain or distress caused to the animal as a result of the procedure.

In most cases, pain relief will be a restricted veterinary medicine (RVM) under the Agricultural Compounds and Veterinarian Medicines Act 1997 (ACVM Act), which requires veterinary authorisation.

RVMs can pose significant risks, particularly to the welfare of the animals treated and residues that could jeopardise trade. As such the use of RVMs requires oversight to ensure that the risks are kept at an acceptable level.

How can I access pain relief?

Under the ACVM Act, only veterinarians are able to authorise the purchase and use of RVMs²⁸.

The ACVM Act does allow veterinarians to authorise non-veterinarians to hold RVMs in anticipation of use, and administer these medicines without a veterinarian being present. The authorising veterinarian, in certain situations after assessing whether direct veterinary oversight is needed for the use of RVMs, can decide to issue Veterinary Operating Instructions (VOI) to allow this. VOIs are a set of instructions from the veterinarian to the non-veterinarian that authorise RVMs to be held in anticipation of their use, and provide detailed instructions on when and how the RVMs can be used.

²⁸ http://www.foodsafety.govt.nz/elibrary/industry/Veterinarians_Recognised-Sets_Expectations.pdf

VOIs address all matters requiring consideration by the veterinarian, and can include situations where the non-veterinarian has been trained by the veterinarian to perform a repeatable procedure or treatment involving RVMs. Use of RVMs under a VOI means veterinary discretion, oversight and guidance is not required for each individual animal on which the procedure or treatment is undertaken e.g. deer de velvetting, or disbudding calves, lambs or kids.

Before a veterinarian can authorise the use of the RVM, they must first assess the need for an RVM and determine which RVM will be most appropriate in each case. When considering authorisation for a non-veterinarian to hold RVMs in anticipation of use, the veterinarian must also:

- establish that the purchase, holding for use, and use of the RVM is appropriate and justified under the circumstances; and
- confirm that any person who will administer the RVM understands and is able to competently carry out the authorising veterinarian's instructions for use; and
- provide direction (or make arrangements) to address anticipated adverse events that are likely to arise from the use of the RVM.

Further information on VOIs is available in MPI's guidance material on VOIs²⁹.

Pain relief questions

Some of the regulatory proposals include a requirement for pain relief to be used at the time of the procedure. We are interested in the feasibility and practicality of accessing and administering pain relief in these situations. In particular:

- Are there any instances where the proposed definition of pain relief at the time of the procedure, outlined in Box 2 on pages 75-76, would be problematic?
- In the proposals some procedures can be performed by a non-veterinarian with pain relief - in most cases the pain relief will need to be authorised by a veterinarian (see Box 2).
 - Is it appropriate for a veterinarian to authorise a non-veterinarian to hold and use pain relief for all the procedures discussed in the following tables?
 - Are there any factors, other than the nature of the procedure, which could limit access to pain relief under the VOI framework discussed in Box 2?
- In addition, the regulatory proposals address pain relief at the time of the procedure. What, if anything, is used to mitigate post-operative pain? How frequently, and in what circumstances is post-operative pain mitigated?

Good practice

Whether a procedure is good practice needs to be determined, in each case, by what is appropriate to the species, environment and circumstances of the animal.

In looking at whether a procedure reflects good practice, consideration was given to whether it was necessary or reasonable, including, the benefits and harms of the procedure to the

²⁹ http://www.foodsafety.govt.nz/elibrary/industry/Veterinary_Operating-Guidelines_Issuing.pdf

animal and management and production systems related to the animal and whether there are any less harmful alternatives³⁰.

For example, the proposed regulations consider tail docking standards for five different species of animal—horses, dogs, cattle, pigs and sheep. The proposals for each species differ and reflect a balance between the benefits of undertaking the procedure, the harms caused by the procedure itself, and whether there are alternatives to achieving the benefits or reducing the harms. The specific detail for each proposal is outlined in the following tables.

Involvement of veterinarians

Under section 15 of the Act, a significant surgical procedure must only be undertaken by a veterinarian or veterinary student acting under the direct supervision of a veterinarian. Although exceptions will be able to be provided in the regulations where appropriate, the criteria for determining whether a procedure is a significant surgical procedure, which will be included within the Act, reduces the ambiguity about when a veterinarian needs to be involved.

Regulations are also able to be made that prescribe requirements in relation to the performance of specified surgical or painful procedures. This may include requiring that only veterinarians carry out some of the specified procedures.

12.4 THE PROPOSALS

51. All animals – Hot branding	
Proposal	Prohibit hot branding <i>Hot branding is used on some types of animals for identification. Hot-iron branding involves the use of a hot iron that burns the skin, creating a permanent mark on which no hair will grow.</i>
Current state	<p>Section 29(f) of the Animal Welfare Act – a person commits an offence who brands any animal in such a manner that the animal suffers unreasonable or unnecessary pain or distress</p> <p>(the code notes that regulations are being developed and, as such, some of the minimum standards in the code may need to be reviewed following consultation as part of the regulation developing process).</p> <p>Minimum Standard 12 – Identification</p> <p>(b) Pain relief must be used with hot branding</p> <p>Recommended Best Practice</p> <p>(d) Hot branding should not be used</p>

³⁰ NAWAC took a similar approach when it developed the requirements set out in the PHP code of welfare 2005 (see the report on the PHP code of welfare <https://www.mpi.govt.nz/protection-and-response/animal-welfare/codes-of-welfare/>).

How will regulation help?	Provides clarity that the cropping of a dog's ear, for the purpose of making it stand upright, will continue to be an offence. Placing the prohibition in regulation means it will be directly enforceable.
Penalty	A prosecutable regulation offence. Can include a criminal conviction. Maximum penalty fine of \$5,000 for an individual, \$25,000 for a body corporate.
Additional questions and information	Refer to the general questions set out in sections 9.1 and 12.1.

61. Dogs – Dew claws	
Proposal	<p>Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:</p> <ul style="list-style-type: none"> - Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian; - Must only be performed for therapeutic reasons; and - Pain relief must be used at the time of the procedure. <p>Hind limb dew claws: non-articulated (greater than or equal to four days of age):</p> <ul style="list-style-type: none"> - Must be performed by a veterinarian or veterinary student under supervision; and - Pain relief must be used at the time of the procedure. <p><i>For the purposes of this regulatory proposal 'performed for therapeutic reasons' will mean to undertake a procedure to respond to disease or injury.</i></p> <p><i>Note: there is no proposal to regulate the removal of non-articulated hind limb dew claws in puppies under four days old.</i></p>
Current state	<p>Minimum Standard 16 – Dew Claws</p> <p>(a) Where dew claws are to be removed from puppies by a person other than a veterinarian, it must be done before the eyes have started to open or before four days old, whichever comes first.</p> <p>(b) Where dew claws are removed by a person other than a veterinarian, that person must possess the knowledge, training and competence, in relation to that procedure, that is necessary to maintain the health and welfare of the pup.</p> <p>(c) Dew claws on dogs after their eyes have begun to open or after four days of age, must only be removed by a veterinarian.</p> <p>(d) If dew claw removal is not performed, care must be taken to manage any consequential risks to animal health and welfare.</p> <p>Recommended Best Practice</p> <p>(a) Jointed dew claws should not be routinely removed.</p> <p>(b) Dew claw removal, when conducted, should be carried out by a veterinarian.</p>
What is the problem?	Articulated dew claws are firmly attached to the leg. Most front limb dew claws are articulated. Articulated claws may also be found on a dog's hind limbs.

	<p>The removal of articulated dew often requires the bone to be cut through. This can result in complications including pain, haemorrhage, infection and scarring if not performed correctly.</p> <p>In addition, articulated dew claws may function to prevent foot injury by providing support when running³⁷ and to keep objects steady while a dog is chewing them.</p>
How will regulation help?	<p>Provides clear mandatory standards for the procedure.</p> <p>Minimises the level of pain and distress caused by:</p> <ul style="list-style-type: none"> • requiring pain relief at the time of the procedure; and • in the case of front limb dew claws and articulated hind limb dew claws, limiting the procedure to situations where it is being undertaken to respond to injury or disease.
Penalty	<p>A prosecutable regulation offence. Can include a criminal conviction.</p> <p>Maximum penalty fine of \$5,000 for an individual, \$25,000 for a body corporate.</p>
Additional questions and information	<p>Refer to the general questions set out in sections 9.1 and 12.1.</p> <p>In addition, please also consider the following questions:</p> <p>For the purposes of this regulatory proposal it is proposed that the term 'performed for therapeutic reasons' will mean to undertake a procedure to respond to disease or injury.</p> <p>Is it clear from the above definition when the procedure would be performed for therapeutic reasons? If not, why not?</p> <p>Should this procedure be limited to therapeutic purposes only, if not, why?</p>

62. Dogs – Tail docking	
Proposal	<p>Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian</p> <p>Must only be performed for therapeutic reasons</p> <p>Pain relief must be used at the time of the procedure.</p> <p><i>Docking in the context of this proposal means the shortening or removal of the tail by any means. This relates to docking that may occur either directly after application of the method (e.g. surgery), or at any stage afterwards (e.g. banding).</i></p> <p><i>For the purposes of this regulatory proposal it is proposed that the term 'performed for therapeutic reasons' will mean to undertake a procedure to respond to disease or injury.</i></p>
Current state	<p>Minimum Standard 17 – Tail docking</p> <p>(a) Tails may only be shortened or removed by using a tail band—</p> <p>(i) in puppies that are less than four days old in which the eyes have not started to open; and</p> <p>(ii) by a person who possesses the appropriate knowledge, training and competency necessary to do so effectively, and who is acting under a documented quality assurance scheme that assures compliance with this minimum standard; and</p>

³⁷ Zink M. Christine (2013). What is a canine athlete?, in "Canine Sports Medicine and Rehabilitation", eds. M. C. Zink and J. B. van Dyke, pp1-18.

	<p>(iii) the remaining length of the tail must be sufficient to avoid compromising health and welfare when the dog is mature.</p> <p>(b) Tails that need to be shortened or removed to manage existing injury or disease, must only be shortened or removed by a veterinarian using appropriate pain relief.</p> <p>Recommended Best Practice</p> <p>(a) Tail docking should not be performed at all unless it is required for treatment of an existing injury or disease.</p>
What is the problem?	<p>Dogs' tails have a function in terms of balance and a means of communication with other dogs and humans. Research has shown that a longer tail is more effective at conveying different cues such as those provided by tail motion³⁸.</p> <p>The primary reasons that dogs' tails are docked are aesthetic (e.g. breed standards), convenience, to allow for physical adaptation and prevent injury. Much of the debate supporting tail docking is centred on whether the animal feels pain at the time of the procedure. The science on this issue is complex and both sides can cite research that supports their respective positions³⁹.</p> <p>Given that dogs' tails have a function, factors in addition to whether or not docking causes pain need to be considered, including whether the procedure is necessary or reasonable.</p> <p>Injury prevention is the other main reason cited for supporting tail docking in dogs. Overall, recent research suggests that tail docking to prevent injury is unnecessary. Far more dogs generally need to have their tails docked than would suffer an injury if they were not docked. In addition, tail injuries represent only a small percentage of why dogs are presented to a veterinary clinic—most research studies report that the prevalence of tail injuries represents less than 1 percent of all veterinary clinic visits. Studies do differ as to whether working dogs have a higher incidence of tail injury. For example, while a Scottish study found that certain working dog breeds were at a higher risk of injury, a New Zealand based study found that causes of injury varied but that farming or work related injuries were not overly represented as a cause of tail injury^{40, 41, 42, 43}.</p> <p>Internationally tail docking is either banned or restricted in over 30 countries worldwide. Australia, Scotland, parts of Canada and Switzerland are among the jurisdictions that have banned the practice outright. Countries such as England, Germany and Wales have restricted the practice to certain working dogs. In these countries tail docking can only be performed by a veterinarian.</p>
How will regulation help?	<p>Provides clear mandatory standards for the procedure.</p> <p>Minimises the level of pain and distress caused by requiring pain relief at the time of the procedure and limiting the procedure to situations where it is being undertaken to respond to injury or disease.</p>

³⁸ Leaver, SDA, Reimchen TE. (2008). Behavioural responses of Canis Familiaris to different tail lengths of a remotely-controlled life-size dog replica. Behaviour 145:377-390.

³⁹ See the report supporting the development of the Dogs code of welfare 2010 - <https://www.mpi.govt.nz/protection-and-response/animal-welfare/codes-of-welfare/>

⁴⁰ Cameron, N., Lederer, R., Bennett, D. and Parkins, T. (2014). The prevalence of tail injuries in working and non-working breed dogs visiting veterinary practices in Scotland.

⁴¹ Wells, A. (2013). Canine tail injuries in New Zealand: causes, treatments and risk factors and the prophylactic justification for canine tail docking. <http://mro.massey.ac.nz/handle/10179/4782>

⁴² Diesel, G., Pfeiffers, D., Crispin, S. and Brodbelt, D. (2010). Risk factors for tail injuries in dogs in Great Britain

⁴³ Lederer, R., Bennett, D., and Parkins, T. (2014). Survey of tail injuries sustained by working gundogs and terriers in Scotland

Penalty	A prosecutable regulation offence. Can include a criminal conviction. Maximum penalty fine of \$5,000 for an individual, \$25,000 for a body corporate.
Additional questions and information	<p>Refer to the general questions set out in sections 9.1 and 12.1.</p> <p>In addition, please also consider the following questions:</p> <p>For the purposes of this regulatory proposal it is proposed that the term 'performed for therapeutic reasons' will mean to undertake a procedure to respond to disease or injury.</p> <p>Is it clear from the above definition when the procedure would be performed for therapeutic reasons? If not, why not?</p> <p>Should this procedure be limited to therapeutic purposes only, if not, why?</p>

63. Cattle – Teats	
Proposal	<p>Supernumerary teat removal (up to 6 weeks of age)—when not performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian:</p> <ul style="list-style-type: none"> - May be performed by any person. - Must create a clear cut and not tear or crush the tissue. Clean scissors, free of visible contamination, must be used for the procedure. <p>Teat removal (of one of the main 4 teats) or supernumerary teat removal (over 6 weeks of age):</p> <ul style="list-style-type: none"> - Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. - Pain relief must be used at the time of the procedure. <p><i>A supernumerary teat is a small teat on a cow's udder, in addition to the four main teats, which can sometimes have teat canals, gland tissue and produce milk. During milking, they can interfere with the placement of milking cups and be a source of discomfort to the cow, and are occasionally at risk of mastitis.</i></p>
Current state	<p>There are no specific minimum standards or Act requirements related to teat or supernumerary teat removal.</p> <p>The code includes two minimum standards and associated recommended best practice that relate to ensuring procedures are only undertaken when they can be justified and that any harmful consequences are minimised (see Appendix 4 for the specific standards). The code states these general principles apply to all painful husbandry procedures and not just those specifically mentioned in the code.</p>
What is the problem?	<p>The removal of supernumerary teats may, depending on size of the teat and the age of the animal, meet the criteria for a significant surgical procedure that will be included within the Act once the regulations come into force. As such, there is likely to be ambiguity around who is able to undertake this procedure in the future.</p> <p>As the supernumerary teat gets larger, removal is associated with a greater level of pain and risk of bleeding, and may require wound closure. In contrast, supernumerary teats under 6 weeks of age tends to be tiny layers of skin with</p>

	<p>issued automated tail trimmers have become available that are more efficient than previous methods.</p> <p>Internationally, docking is banned in Germany, Denmark, the United Kingdom and California. Some states in Australia also ban docking if not undertaken by a veterinarian. In addition, not tail docking is becoming a requirement to access some overseas markets and as such failure to take steps to constrain tail docking in New Zealand could have international reputational risks.</p>
How will regulation help?	<p>Provides clear mandatory standards for the procedure.</p> <p>Minimises the level of pain and distress caused by requiring pain relief at the time of the procedure and limiting the procedure to situations where it is being undertaken to respond to injury or disease.</p>
Penalty	<p>A prosecutable regulation offence. Can include a criminal conviction. Maximum penalty fine of \$5,000 for an individual, \$25,000 for a body corporate.</p>
Additional questions and information	<p>Refer to the general questions set out in sections 9.1 and 12.1.</p> <p>In addition, please also consider the following questions:</p> <p>Is it clear from the above definition when the procedure would be performed for therapeutic reasons? If not, why not?</p> <p>Should this procedure be limited to therapeutic purposes only, if not, why?</p> <p>For the purposes of this regulatory proposal it is proposed that the term 'performed for therapeutic reasons' will mean to undertake a procedure to respond to disease or injury.</p> <p>Are there any costs associated with restricting this procedure to therapeutic purposes only?</p>

67. Cattle and sheep – Castration and shortening of the scrotum (Cryptorchid)	
Proposal	<p>Castration⁴⁹ and shortening of the scrotum (under 6 months of age):</p> <ul style="list-style-type: none"> – May be undertaken by any person. – Conventional rubber rings must only be used for this procedure. <p>Castration and shortening of the scrotum (over 6 months of age):</p> <ul style="list-style-type: none"> – Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. – Pain relief must be used at the time of the procedure. <p>Surgical castration (at any age):</p> <ul style="list-style-type: none"> – Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. – Pain relief must be used at the time of the procedure. <p><i>These procedures are undertaken for a number of reasons, including: reducing aggression and facilitating management, restricting breeding and achieving desirable meat and carcass quality.</i></p>
Current state	<p>The code includes two minimum standards and associated recommended best practice that relate to ensuring procedures are only undertaken when</p>

⁴⁹ Castration when not surgical castration.

	<p>they can be justified and that any harmful consequences are minimised (see Appendix 4 for the specific standards).</p> <p>Minimum Standard 3 – Castration and Shortening of the Scrotum (Cryptorchid)</p> <ul style="list-style-type: none"> (b) The method of castration, or shortening of the scrotum, must be chosen, and applied, so as to minimise the acute as well as chronic consequences for the health and welfare of the animal. (b) While complying with Minimum Standard 2(a), castration, or shortening of the scrotum, without pain relief must be performed when the animals are as young as possible, but not greater than six months of age. (c) When castrating or shortening the scrotum of any animal over the age of six months, pain relief must be used. (d) When using rubber rings to castrate, they must be placed above the testes and below the teats, and must be of a tension and size appropriate to the animal in order to ensure that blood supply to the testes and scrotum is stopped immediately. (e) When shortening the scrotum with rubber rings, they must be placed below the testes taking care not to include the testes within the ring, and they must be of a tension and size appropriate to the animal in order to ensure that blood supply to the scrotum is stopped immediately. (f) If high tension bands are used to castrate an animal: <ul style="list-style-type: none"> (i) local anaesthetic must be used (at any age) to provide pain relief; and (ii) the band must be positioned on the scrotal neck as close to the testes and as far from the abdomen as possible. <p>Recommended Best Practice</p> <p>Pain relief should be provided when animals are castrated, or have their scrotums shortened, at any age.</p> <p>Conventional rubber rings should be used on younger animals in preference to the use of high tension bands at any age, since the former procedure is less noxious.</p>
What is the problem?	<p>These procedures are likely to meet the criteria (see Box 1 on page 8) for determining whether it is a significant surgical procedure. The criteria will come into effect when the regulations come into force. Regardless of the animals' age, without regulations specifying otherwise this procedure would only be able to be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian.</p> <p>The current practice where sheep and cattle, under 6 months of age, are routinely castrated by non-veterinarians is generally considered appropriate given the balance between the benefits to animal management/production and the pain experienced by the animal.</p> <p>However, some methods result in the animal experiencing more pain and distress than others⁵⁰. This is reflected in the current minimum standards by the fact that pain relief is required when high tension bands are used. Restricting castration to conventional rubber rings when the procedure is</p>

⁵⁰ Painful Husbandry Procedures (PHP) code of welfare and report supporting the development of the PHP code of welfare - <https://www.mpi.govt.nz/protection-and-response/animal-welfare/codes-of-welfare/>
Report on the PHP code of welfare - <https://www.mpi.govt.nz/protection-and-response/animal-welfare/codes-of-welfare/>

	being undertaken by a non-veterinarian will help minimise the level of pain and distress an animal experiences during the procedure.
How will regulation help?	Provides clear mandatory standards for the procedure. Allows non-veterinarians to undertake a procedure, within appropriate constraints, that is likely to meet the criteria for a significant surgical procedure that will be included within the Act once the regulations come into force.
Penalty	Castration and shortening of the scrotum (under 6 months of age) <ul style="list-style-type: none"> Proposed infringement offence with a fee of \$500. No criminal conviction. Castration and shortening of the scrotum (Cryptorchid) (over 6 months age) <ul style="list-style-type: none"> A prosecutable regulation offence. Can include a criminal conviction. Maximum penalty fine of \$5,000 for an individual, \$25,000 for a body corporate. Surgical castration (at any age) <ul style="list-style-type: none"> A prosecutable regulation offence. Can include a criminal conviction. Maximum penalty fine of \$5,000 for an individual, \$25,000 for a body corporate.
Additional questions and information	Refer to the general questions set out in sections 9.1 and 12.1. In addition, please also consider the following questions: What is the normal age of castrating sheep and cattle in New Zealand? Is the 6 months of age differentiation outlined in the proposal appropriate, if not, why not? How frequently are high tension bands used and in what types of situations—can alternatives be used in these situations, if not, why not?

68. Cattle, sheep, & goats – Disbudding

Proposal	<p>May be performed by any person.</p> <p>Pain relief must be used at the time of the procedure.</p> <p><i>Disbudding is the destruction, by any method, of the free-floating immature horn tissue (horn 'buds' growing from the skin) from which the horns of an animal subsequently develop.</i></p> <p><i>Animals are disbudded to reduce the significant risk that horns pose to the health and welfare of other animals and humans.</i></p>
Current state	<p>The code includes two minimum standards and associated recommended best practice that relate to ensuring procedures are only undertaken when they can be justified and that any harmful consequences are minimised (see Appendix 4 for the specific standards).</p> <p>Minimum Standard 5 – Disbudding and Dehorning</p> <p>(b) When disbudding is performed, the following must apply:</p> <ul style="list-style-type: none"> (i) the method must be chosen and undertaken so as to minimise the pain and distress and other negative health consequences (e.g. infection) for the animal; (ii) if used, thermal cauterising equipment must be used in such a way as to minimise the risk of thermal injury to tissues other than the horn bud and adjacent skin; and

	<p>specifying otherwise, this procedure would only be able to be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian.</p> <p>The current practice where animals are routinely dehorned by non-veterinarians is generally considered appropriate given the balance between the practicalities of undertaking the procedure and the significant risk that horns pose to the health and welfare of other animals and humans.</p> <p>However, this procedure causes significant pain to an animal when it is performed without pain relief [use PHP code report as reference]. Disbudding is preferable to dehorning as it results in markedly less pain than dehorning. In 2005 when the painful husbandry code of welfare was developed, NAWAC signalled that continued effort was required to minimise pain and distress associated with procedures like dehorning, including the wider use of pain relief.</p>
How will regulation help?	<p>Provides clear mandatory standards for the procedure.</p> <p>Allows a non-veterinarian to undertake a procedure, within appropriate constraints, that is likely to meet the criteria for a significant surgical procedure that will be included within the Act once the regulations come into force.</p> <p>Minimises the level of pain and distress caused by requiring pain relief at the time of the procedure.</p>
Penalty	<p>A prosecutable regulation offence. Can include a criminal conviction. Maximum penalty fine of \$5,000 for an individual, \$25,000 for a body corporate.</p>
Additional questions and information	<p>Refer to the general questions set out in sections 9.1 and 12.1.</p> <p>In addition, please also consider the following question:</p> <p>What is the point where dehorning is distinct from disbudding— is it based on age, method or other factor?</p>

70. Sheep – Tail docking

Proposal	<p>Tail docking (under 6 months of age):</p> <ul style="list-style-type: none"> - May be performed by any person. - Must use hot iron or rubber rings only. - Tail must not be flush. <p>Tail docking (over 6 months of age):</p> <ul style="list-style-type: none"> - Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. - Pain relief must be used at the time of the procedure.
Current state	<p>The code includes two minimum standards and associated recommended best practice that relate to ensuring procedures are only undertaken when they can be justified and that any harmful consequences are minimised (see Appendix 4 for the specific standards).</p> <p>Minimum Standard 4 – Tail docking</p> <p>(a) Tail docking of sheep must only be undertaken where there is significant risk of faecal and urine contamination, and/or flystrike, that leads to poor hygiene, health and welfare and/or failing to do so adds a significant cost to the farm system.</p>

	<p>(b) While complying with Minimum Standard 2(a), castration, or shortening of the scrotum, without pain relief must be performed when the animals are as young as possible, but not greater than six months of age.</p> <p>(c) When tail docking a sheep over the age of six months, pain relief must be used.</p> <p>Recommended Best Practice Operators should seek up-to-date advice from competent sources, including veterinarians and industry advisory bodies, on the best method of tail docking or shortening, and use it, so as to minimise the acute and any chronic consequences for the health and welfare of the animal. When sheep are tail docked, their tails (excluding any wool) should be left long enough to cover the vulva in females and at a similar length in males. Tail docking of sheep should be undertaken before six weeks of age. Should practical and economic methods of providing pain relief for tail docking become available, they should be used.</p>
What is the problem?	<p>This procedure could meet the criteria (see Box 1 on page 8) for determining whether it is a significant surgical procedure. The criteria will come into effect when the regulations come into force. Regardless of age, without regulations specifying otherwise, this procedure would only be able to be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian.</p> <p>The current requirements for tail docking in sheep are generally considered appropriate given the balance between the benefits of tail docking reducing problems such as fly strike and the pain associated with the procedure.</p> <p>However, some methods and/or practices are more painful and/or cause more problems than others. Restricting methods and practices to those that result in the least pain helps to further reduce the impact of this procedure.</p>
How will regulation help?	<p>Provides clear mandatory standards for the procedure.</p> <p>Allows a non-veterinarian to undertake a procedure, within appropriate constraints on method and practice that could meet the criteria for a significant surgical procedure that will be included within the Act once the regulations come into force.</p> <p>Minimises the level of pain and distress caused by requiring pain relief at the time of the procedure.</p>
Penalty	<p>Tail docking (under 6 months of age):</p> <ul style="list-style-type: none"> Methods other than hot iron or rubber rings are used - Proposed infringement offence with a fee of \$500. No criminal conviction. Tail must not be cut flush - Proposed infringement offence with a fee of \$500. No criminal conviction. <p>Tail docking (over 6 months of age):</p> <ul style="list-style-type: none"> A prosecutable regulation offence. Can include a criminal conviction. Maximum penalty fine of \$5,000 for an individual, \$25,000 for a body corporate.
Additional questions and information	<p>Refer to the general questions set out in section 9.1 and 12.1.</p> <p>In addition, please also consider the following questions:</p> <p>How should the tail length be specified? Is it clear what is meant by 'must not be cut flush'?</p> <p>What is the normal age of docking a sheep's tail in New Zealand?</p>

Additional questions and information	Refer to the general questions set out in sections 9.1 and 12.1.
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81. Pigs – Tail docking	
Proposal	<p>Tail docking (under 7 days):</p> <ul style="list-style-type: none"> – May be undertaken by anyone. – The procedure must create a clear cut and not tear or crush the tissue. <p>Tail docking (over 7 days):</p> <ul style="list-style-type: none"> – Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. – Pain relief must be used at the time of the procedure. <p><i>Tail docking is performed to reduce the incidence of tail biting.</i></p>
Current state	<p>Minimum standard 16 – Elective husbandry procedures</p> <p>(a) Elective husbandry procedures must only be carried out where they are justifiable to prevent undesirable consequences that could subsequently result in animal suffering.</p> <p>(b) Tail docking of pigs over seven days of age or surgical castration at any age must be carried out by a veterinarian.</p> <p>Recommended Best Practice</p> <p>(a) Pain relief should be given when any elective husbandry procedure is carried out.</p> <p>(c) Other measures to control tail biting should be considered before tail docking is undertaken.</p> <p>(d) Where tail docking is undertaken as a preventative measure for tail biting, it should be carried out on the piglets within 72 hours of birth. Only one-third to one-half of the tail should be removed.</p> <p>The code includes two minimum standards and associated recommended best practice that relate to ensuring procedures are only undertaken when they can be justified and that any harmful consequences are minimised (see Appendix 4 for the specific standards). The code states these general principles apply to all painful husbandry procedures and not just those specifically mentioned in the code.</p>
What is the problem?	<p>This procedure could meet the criteria (see Box 1 on page 8) for determining whether it is a significant surgical procedure. The criteria will come into effect when the regulations come into force. Regardless of the age of the animal, without regulations specifying otherwise, this procedure would only be able to be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian.</p> <p>The current requirements, which are reflected in this regulatory proposal for pig tail docking, are generally considered appropriate given the balance between the benefits of tail docking reducing problems such as tail biting and the pain associated with the procedure.</p>
How will regulation help?	Provides clear mandatory standards for the procedure.

	<p>Allows non-veterinarians to undertake a procedure, within appropriate constraints, that is likely to meet the criteria for a significant surgical procedure.</p> <p>Minimises pain and distress by requiring pain relief at the time of the procedure when undertaken over 7 days of age.</p>
Penalty	<p>Tail docking (under 7 days)</p> <ul style="list-style-type: none"> Proposed infringement offence with a fee of \$500. No criminal conviction. <p>Tail docking (over 7 days)</p> <ul style="list-style-type: none"> A prosecutable regulation offence. Can include a criminal conviction. Maximum penalty fine of \$5,000 for an individual, \$25,000 for a body corporate.
Additional questions and information	<p>Refer to the general questions set out in sections 9.1 and 12.1.</p> <p>In addition, please also consider the following questions:</p> <p>Is the 7 day differentiation appropriate for all pig farming arrangements, if not, why not?</p>

82. Birds – Pinioning or otherwise deflighting a bird

Proposal	<p>Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.</p> <p>Must only be performed in the best interests of the animals.</p> <p>Pain relief must be used at the time of the procedure.</p> <p><i>Pinioning is the surgical pinioning i.e. permanent deflighting.</i></p> <p><i>For the purposes of this proposal the term 'best interests of the animal' means: this procedure should only be contemplated after other suitable means of confining the bird have been attempted and have failed and euthanasia is the only alternative.</i></p> <p><i>Restricting a procedure to 'in the best interest of the animals' does not preclude a vet from undertaking the procedure for therapeutic reasons as a result of disease or injury.</i></p>
Current state	<p>Minimum Standard 11– Normal Patterns of Behaviour</p> <p>(e) Pinioning involving significant muscle, tendon, or bone damage to the wing must only be undertaken by a veterinarian and with appropriate pain relief for the bird.</p>
What is the problem?	<p>This procedure is likely to meet the criteria (see Box 1 on page 8) for determining whether it is a significant surgical procedure. The criteria will come into effect when the regulations come into force.</p>
How will regulation help?	<p>Provides clear mandatory standards for the procedure.</p> <p>Minimises the level of pain and distress caused by requiring pain relief at the time of the procedure.</p>
Penalty	<p>A prosecutable regulation offence. Can include a criminal conviction. Maximum penalty fine of \$5,000 for an individual, \$25,000 for a body corporate.</p>
Additional questions and information	<p>Refer to the general questions set out in sections 9.1 and 12.1.</p> <p>In addition, please also consider the following questions:</p>

Appendix 4: Minimum standards within the Painful Husbandry Procedures code of welfare 2005 that apply to all painful husbandry procedures

Minimum Standard 1 – Justification for Painful Procedures

Painful husbandry procedures must only be performed where there are no other practical, economically viable, effective, less noxious alternatives to the procedure; and they:

- (i) result in an overall enhancement of the animals' welfare through reduced susceptibility to ill-health, injury or compromised welfare; or
- (ii) facilitate advantageous farm management systems; or
- (ii) result in an enhanced animal product; or
- (iv) result in reduced safety risks to humans.

Recommended Best Practice

- Careful consideration should be given to the need to perform routine, painful husbandry procedures on any animal. The benefits to the animal, to farm management, to product harvest or attributes, or to human safety from treating the animal in that way should outweigh any discomfort, pain or distress caused to the animal.
- Operators should seek-up-to-date advice from competent sources, including veterinarians and industry advisory bodies, on the need to undertake husbandry procedures resulting in pain in animals. This should include
 - o whether it is necessary to perform the procedure;
 - o whether the procedure causes pain;
 - o if it does cause pain, can the issue it addresses be resolved or managed in other less invasive ways;
 - o if it cannot be managed in other ways, what is the best method, the optimal age for the animal for undertaking the procedure; and
 - o can any discomfort, pain or distress associated with the procedure be minimised or relieved, including through the use of pain relief or using a veterinarian to undertake the procedure?
- Economically viable and practicable farming systems and practices not requiring the routine use of painful husbandry procedures should be adopted in preference.

Minimum Standard 2 – Minimising Harmful Consequences

- (a) Painful husbandry procedures must not be performed on new-born animals less than 12 hours old, where handling, pain and post-operative complications are likely to compromise survival through impairing maternal bonding and/or colostrum intake.
- (b) If painful husbandry procedures that have animal health and welfare benefits are not used, care must be taken to manage any consequential risks to animal health and welfare of not using them.

Recommended Best Practice

- Consideration should be given to means of minimising any discomfort, pain or distress caused to the animal as a result of the husbandry procedure.
- If painful husbandry procedures are used, the methods and techniques likely to cause the least discomfort, pain or distress within particular practical and economic constraints should be used.
- Pain relief should be used if it is economically and practically viable to do so.
- Animals should be checked for signs of post-operative complications, including significant pain and distress, and appropriate remedial action taken as required.

breast ² *n.* (Hist.) close ship's bottom, by heaving and scraping. [prob. f. *brēst* *v.* *breast*]

breast ¹ *(-ēst)* *n.* 1. either of the two milk-secreting organs on upper front of woman's body; corresponding usu. rudimentary part of man's body; (fig.) source of nourishment. 2. upper front of human body or of coat, dress, etc.; corresponding part of animals; CHIMNEY-breast; heart, emotions, thoughts, (make a clean ~ of, confess fully); BEAT² one's breast. 3. ~bone, thin flat vertical bone or cartilage in chest connecting ribs; ~drill (pushed with breast to press against workpiece); ~fed, -feeding, (at mother's breast, opp. from bottle); ~high, high as the breast, (submerged) to the breast, (of scent) so strong that hounds race with heads up; ~pin (jewelled etc., worn in tie); ~plate, vestment or piece of armour covering breast, lower shell of turtle, tortoise, etc., inscription-plate on coffin; ~stroke, stroke made while swimming on the breast by extending the arms in front and sweeping them back; ~wall (confining a bank of earth); ~wheel, water-wheel with water admitted near axle; ~work, temporary breast-high defence or parapet. 4. Hence (-)~ED² *a.* [OE *brēst*, = OS *brīst*, ON *brjst* f. Gmc **breustam*]

breast ² *(-ēst)* *v.t.* oppose the breast to; face, contend with, (waves, hill); climb (hill); breast the TAPE. [f. prec.]

breastsummer *(-ēst-)* *n.* beam across broad opening, sustaining superstructure. [f. BREAST¹ + SUMMER²]

breath *(-ēth)* *n.* exhalation as perceptible to sight or smell or hearing (below or under one's ~, in a whisper); slight movement of air; whiff of perfume etc.; air taken into and expelled from lungs (draw ~, breathe, live; a ~ of (brief time in or small amount of) fresh air; waste ~, talk in vain; keep or save one's ~ to cool one's porridge, save one's ~, abstain from useless talk; ~ of life, a necessity); process of respiration (catch, hold, one's ~, in fear or absorbing emotion); one respiration (say inconsistent things in the same breath); power of breathing (out of ~, not able to breathe quick enough after exertion; take ~, pause to rest; take person's ~ away, make him breathless with delight, surprise, etc.; so ~-taking *a.*); whisper, murmur, (not a breath of suspicion); ~test (given with breathalyzer). [OE *brāth* f. Gmc **brēthaz* f. IE **bhrētos* (**bhrē-* burn)]

breathalyser, **alyzer*, (brē'-; -zer) *n.* instrument measuring amount of alcohol in breath; so **breathalyse** (brē'-; -z) *v.t.*, carry out such measurement on. [f. BREATH + ANALYSE + -ER¹]

breathe *(-ēdh)* *v.* 1. *v.i.* take air into and expel it from the lungs (~ down person's neck, be close behind him esp. in pursuit or from mistrust); be or seem alive; take breath, pause, (~ again, freely, recover from fear etc., be at ease); (of wine, fabric) be exposed to fresh air; sound, speak, (of wind) blow, softly (~ upon, tarnish, taint). 2. *v.t.* send out or take in (as if) with breathed air (~ one's last, die); utter (not ~ a word of, keep quite secret); exhibit (breathe defiance, simplicity); allow (horse etc.) to breathe, give rest after exertion. [ME, f. BREATH]

breather *(-ēdh-)* *n.* In vbl senses; short spell of exercise; brief pause for rest; safety-vent in crankcase etc. [f. prec. + -ER¹]

breathing *(-ēdh-)* *n.* In vbl senses; (Gk Gram.) rough, smooth, ~, signs (cf. Appendix II) indicating that initial vowel or rho is or is not aspirated; ~space, time to breathe, pause. [f. BREATHE + -ING¹]

breathless *(-ēth-)* *a.* panting; holding the breath through excitement etc.; unstirred by wind; hence ~LY² *adv.*, ~NESS *n.* [f. BREATH + -LESS]

breathy *(-ēthi)* *a.* (Of singing-voice) with sound of emission of breath; hence ~NESS *n.* [f. BREATH + -Y²]

breccia *(-cha)* *n.* rock of angular stones etc. cemented by lime etc.; hence **brecciate** *(-chi-)* *v.t.*, form into breccia. [It., = gravel, f. Gmc **brekan* BREAK¹]

breed *See* WATER.

breed *Var. (Arch.) of BREED.*

breed *n.* & *v.* 1. *n.* pair of ~es, belching, short trousers esp. fastened below knee, now used esp. for riding or in court costume etc. B-ES Bible, Geneva Bible of 1560 with breeches for gowns in Gen. 3: 7; ~es-buoy, lifebuoy on rope with canvas breeches for user's legs; trousers or knickerbockers, too long for one's breeches; WEAR² the breeches. 2. buttocks (Arch. exc. w. ref. to baby's position at or before birth); ~birth (with buttocks foremost). 3. part of cannon behind bore, back part of rifle or gun barrel; ~block (closing breech aperture in gun); ~loader, -loading, (gun) loaded at breech, not through muzzle. 4. *v.t.* (Arch.) put (boy) into breeches instead of petticoats. [OE *brēc*, pl. *brēce* (treated as sing. in ME), = OS *brūk*, OHG *bruok*, ON *brök* f. Gmc **brōks*]

breed ¹ *v.t. & i.* (bred). 1. bear, generate, (offspring); propagate (~ in, always mate with or marry near relations); yield, produce, result in; cause to propagate, raise, (cattle, domestic animals); bred in the bone, hereditary. 2. train up (bred to the law); bring up; arise, spread; bred and born or born and bred, by birth and upbringing. 3. (Phys.) create (fissile material) by nuclear reaction. 4. Hence ~ER¹ *n.*; ~ER reactor, nuclear reactor that can create more fissile material than it consumes in the chain reaction. [OE *brēdan*, = OHG *bruotan* f. WG **brōdjan* (**brōd-* BROOD¹)]

breed ² *n.* 1. stock of animals etc. within a species, having similar appearance and usu. developed by deliberate selection. 2. race, lineage. 3. sort, kind. [f. prec.]

breeding *n.* In vbl senses; result of training, behaviour, good manners. [f. BREED¹ + -ING¹]

breeds *n. pl.* (Sc.) Var. of *breeches* (BREECH 1).

breeze *n.* gaddy. [OE *brisa*, of unkn. orig.]

breeze ² *n.*, & *v.i.* 1. *n.* gentle wind; (on Beaufort scale) wind of 4-31 m.p.h.; wind blowing from land at night or sea during day; (sl.) easy task; (sl.) quarrel, display of temper; get, have, put, the ~ (= WIND¹ 6) up; ~way, roofed outdoor passage; hence ~LESS *(-zl-)* *a.* 2. *v.i.* (colloq.) go like a breeze, move along or come in lively or offhand manner. [prob. f. OSp. & Port. *briza* NE wind]

breeze ³ *n.* small cinders etc. used with sand and cement in making ~blocks (lightweight building blocks). [f. F *brasse* live coals]

breezy *a.* wind-swept; pleasantly windy; fresh, lively, jovial; careless; hence ~LY² *adv.*, ~INESS *n.* [f. BREEZE² + -Y²]

bremsstrahlung *(-mzshtrahlōng)* *n.* (Phys.) radiation due to retardation of charged particle by electric field, esp. of nucleus. [G, = braking radiation]

Brén *n.* ~ (gun), light-weight quick-firing machine-gun. [f. *Brno* in Czechoslovakia (where orig. made) + *Enfield* in England (where later made)]

brént, **bränt*, *n.* ~(-goose), smallest species of wild goose (*Bernicla brenta*), visiting Britain in winter. [16th c., of unkn. orig.]

brethren. See BROTHER.

Bré'ton *a. & n.* (native, or Celtic language) of Brittany. [OF, = BRITON]

bré'tzel. Var. of PRETZEL.

brève *n.* 1. (Hist.) authoritative letter from sovereign or pope. 2. (Mus.) note = two semibreves, now rarely used (alla ~ *pr.* *alabrá'vā*, time signature indicating 2 or 4 minims beats in bar). 3. written or printed mark (') of short or unstressed vowel. [ME, var. of BRIEF¹]

bré'vêt *n.*, & *v.t.* 1. *n.* document conferring a privilege from sovereign or government, esp. rank without corresponding pay in army (brevet rank, major). 2. *v.t.* confer brevet rank on. [ME f. OF, dim. of *bref* BRIEF¹]

bré'viary *n.* (RC Ch.) book containing the service for

to, I would on no account; by ~, by a ~ from, more nearly the opposite of (problem is far from easy; (so) far from red it); from ~, from a considerable ~, (fig.) achieve much, contribute; not go ~, be soon spent or used; go beyond limits of what is reasonable, ~, to what extent; (in) so ~ as, to so ~, to such an extent or distance, ~ so ~, progress has been satisfactory, ~, long-past, (of look etc.) (of ~) sounding as if from a ~, infrequent; Far East (ERN); ~ known; ~ fetched, (of simile, illus-fully but unnaturally sought out, not ~; ~ flung, (rhet.) widely extended; ~ off, remote; ~ out, distant, (fig.) unconventional or excellent; ~ applicable, carrying many conse-quences, prudent; ~ sighted, seeing distant things more clearly Far West (ERN). [OE *for* (r), = OS, *ferri*, Goth. *fairra* f. Gmc **ferō* IE **per*-]

superl. as prec.). situated at or great distance in space or time, ~; more distant (the far end of the sea. [OE *feorr*, = OS, OHG *fer* f.

unit of capacitance, such that one causes a potential difference of one volt. [Engl. physicist d. 1867]

ic, *adj.* (Electr.) inductive, in-ductive]

quantity of charge needed to neutralize an element in electrolyzed metal screen excluding elec-
F~'s constant, = *faraday*; F~ plane of polarization of electro-magnetic substances in a magnetic

dance; music for it. [F, *far*]

work meant merely to cause representing ludicrously improbable of drama; absurdly futile pro-mockery. [F, orig. = stuffing, f. *far* to stuff, used metaph. of

joker, wag; actor or writer of farces]

the farce; extremely ludicrous or ~-ish n., ~LY² *adv.* [f. FARCE +

~ bad, button, small lymphatic bacterial disease of cattle. [ME, f. LL *farcinum* (*farcin* stuff)]

etc.) painted with cosmetics. [p.p. *far*]

idle, burden. [ME f. OF, dim. of *far* (a) camel-load; see -LE 2] passenger's conveyance, passage-paying to travel in public vehicle; provided (good, bad, plentiful, etc., etc.) *far* and *faru* journeying, both f.

literary). journey, go, travel; ~ happen, turn out, (how) fares etc., have good, bad, etc., luck; ~ed, be fed or feed oneself, well etc. [OHG, Goth. *farān* f. Gmc **farān*

~ (dh-), **far-e-you-well* (fā'ū-), ~, to the utmost degree, to ~ (impers.) thee of you well = foll.

fārewēll (fārw-) *int.* & *n.* 1. *int.* goodbye!, adieu!, (~ to, there will be no more of). 2. *n.* leave-taking, departure; parting good wishes. [ME, f. imper. of FARE² + WELL²]

far'ina (-ī-, -ē-) *n.* flour or meal of cereal, nuts, or starchy roots; powdery substance; (Bot.) pollen; [(Chem.) starch; so *fārina* GEORG a. [L (*far* corn; see -INE¹)]

fārl *n.* (Sc.) thin cake, orig. quadrant-shaped, of oatmeal or flour. [f. obs. *fardel* quarter (as FOURTH, DEAL¹)]

fārm *n.* 1. tract of land used under one management for cultivation ([home ~, reserved and worked by owner of estate containing other farms; SEWAGE-farm]; ~ (house), dwelling-place attached to farm; tract of water used as a preserve (*fish-farm*; oyster-farm); place for storage of oil etc.; place where animals are bred for fur etc. (*mink farm*); place where children are farmed (see foll.). 2. ~hand, worker on farm; ~stead, farm with buildings on it; ~yard, yard or enclosure attached to farmhouse. [ME f. OF *ferme* f. med. L *firma* fixed payment (L *firma* fix f. *firmus* FIRM²; orig. applied only to leased land)]

fārm *v.* 1. *v.t.* & *i.* cultivate, till; till the soil, be farmer; ~ the bowling, (Cricket) contrive to receive most of balls bowled. 2. *v.t.* take proceeds of (tax, office, etc.) on payment of fixed sum; ~ (out), let out proceeds of (tax etc.) to person for fixed sum, delegate (work) to sub-contractor etc., arrange for (person) to be farmed (see next sense). 3. let the labour of (person) for hire; contract to maintain and care for (person, esp. child) for fixed sum. 4. Hence ~ING (1) *n.* [ME in sense 'rent land', f. prec.]

fārm'er *n.* one who cultivates a farm; one who undertakes collection of taxes after paying fixed fee (~general, of districts in France before the Revolution); one who farms children etc. [ME, f. AF *fermer*, OF *fermier*, f. med. L *firminus*, *firmitor*, (*firma* FIRM¹)]

fā'ō *n.* gambling card-game, with bets on order of appearance of cards. [f. F *pharaon* PHARAOH (said to have been name of king of hearts)]

Farōē'se (fār-, fār-, -z) *a.* & *n.* (pl. same). (native, inhabitant, or Norse language) of Farō Islands. [f. *Farōe* + -ESE]

farou'che (-ōō'sh) *a.* sullen, shy; hence ~LY² (-shli) *adv.* [F, f. OF *farouche*, *farache* f. med. L *forasticus* f. L *foras* out of doors]

farra'gō (-rah'-) *n.* (pl. ~s or ~es). medley, hotch-potch; hence *farra'ginous* *a.* [L *farrago* *farraginis* mixed fodder (*far* corn)]

||*fā'rrier* *n.* smith who shoes horses; horse-doctor; hence *fā'rriery* (2) *n.* [f. OF *ferrier* f. L *ferrarius* (*ferrum* iron, horseshoe; see -ER² (2))]

fā'row (-ō) *n.* & *v.* 1. *n.* giving birth to, litter of, pigs (20 at one farrow). 2. *v.t.* & *i.* (Of sow) produce (pigs). [OE *feorh*, *fēorh* pig, = OS **farh*, OHG *farah* f. WG **farha* f. IE **porikos*]

farro'ca (-ōō'-) *n.* type of flamenco dance. [Sp.]

fā'r'si *n.* Persian language. [Pers.; cf. PARSEE]

fārt *v.i.*, & *n.* (vulg.) 1. *v.i.* emit wind from anus; fool about or around. 2. *n.* emission of wind from anus; contemptible person. [OE **feortan*, = OHG *ferzan*, ON *freta* f. Gmc **fertan* etc.]

fā'ther (-dh-) *adv.* & *a.* (used as compar. of FAR¹). 1. *adv.* to or at a more advanced point or greater extent or distance; = FURTHER 1. 2. *a.* more extended, additional, more; more distant or advanced; = FURTHER 2; hence ~MOST *a.* [ME *ferther* var. of FURTHER]

fā'thest (-dh-) *a.* & *adv.* (used as superl. of FAR¹). 1. *a.* most distant; = FURTHEST 1. 2. *adv.* to or at the greatest distance; = FURTHEST 2. [ME, var. of FURTHEST]

fā'rthing (-dh-) *n.* 1. (Hist.) quarter of a penny, lowest-valued coin recently current in Britain. 2. least possible amount (doesn't matter a farthing; BRASS farthing). [OE *fēorthing* (*fēortha* fourth; see -ING²)]

What is the Fair Trading Act ...

... and how does it affect me?

The Fair Trading Act (Act) exists to promote fair competition and in this way it contributes to the economic wellbeing of all New Zealanders. It prohibits certain conduct in trade, provides for the disclosure of consumer information relating to the supply of goods and services and promotes product safety.

The Commerce Commission's goal is that consumers can be confident of the accuracy of information they receive when making choices. Although the Act does not oblige businesses to provide information to consumers in all circumstances, businesses are obliged to ensure the information they do provide is accurate, and important information is not withheld. This enables consumers to make informed choices about goods and services.

The Commission is responsible for enforcing the Act, but anyone – consumers and businesses alike – can rely on and take their own legal action under the Act. The Commission is also empowered to take enforcement action and will do so when allegations are sufficiently serious to meet its enforcement criteria.

The Act's primary focus is on anyone in trade – from a bank, hotel or department store through to the local plumber or corner dairy. The Act also applies to online sales. It applies to all aspects of the promotion and sale of goods and services – from advertising and pricing to sales techniques and financing. Businesses cannot contract out of their obligations under the Act.

The Act also applies to certain activities whether or not the parties are 'in trade' – such as employment advertising, pyramid selling, and the supply of products covered by product safety and consumer information standards.

Related pages

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Know your rights

It is important that you know your consumer rights when making a purchase. The following information gives you an overview of some of your key rights under the Consumer Guarantees Act and the Fair Trading Act.

This information is also available in several other languages:



The Fair Trading Act

The Fair Trading Act applies to anyone in trade – from big organisations like hotel chains, airlines and department stores, to small or temporary businesses like a souvenir stall or ice cream stand.

The Act makes it illegal for businesses to mislead consumers, give false information, or use unfair trading practices.

The Fair Trading Act covers:

- all aspects of the promotion and sale of goods and services
- anything said about a product or service, either verbally or in writing
- any impressions given by pictures, advertisements, or promotional material.

The Consumer Guarantees Act

The Consumer Guarantees Act applies when you have purchased a good or service normally bought for personal use.

The Act does not apply to private sales.

The Act guarantees that goods or services should:

- be of acceptable quality
- be fit for their purpose
- match their description
- match the sample or demonstration model
- be sold by a trader who has the right to sell them
- be supported by available spare parts and repair facilities (by manufacturers).

Services must be:

- provided with reasonable care and skill
- fit for purpose
- provided within a reasonable time
- provided at a reasonable price.

- there are minimum standards of justice to which the law must conform, eg laws affecting individual liberty should be reasonably certain and clear;
- the law should have safeguards against the abuse of wide discretionary powers;
- unfair discrimination should not be allowed by the law;
- a person should not be deprived of his or her liberty, status or other substantial interest without the opportunity of a fair hearing before an impartial court or tribunal.

The Treaty of Waitangi

The Treaty of Waitangi was signed in 1840, as an agreement between the British Crown and a large number of the Maori of New Zealand. Today the Treaty is widely accepted to be a constitutional document, which establishes and guides relationships between the Crown in New Zealand (as embodied by our government) and Maori. The Treaty of Waitangi had at its heart a promise to protect a living Maori culture; to enable Maori to continue to live in New Zealand as Maori, while at the same time conferring on the Crown the right to govern in the interests of all New Zealanders. This means that the Treaty relationships between the Government and Maori are ongoing and dynamic.

The status of the Treaty in New Zealand law is, however, less than settled. The orthodox view is that where legislation makes no reference to the Treaty, then Treaty rights are unenforceable. Where the Treaty is referred to expressly in statute, the current approach of the courts has been to give effect to the reference. There are a number of statutes which contain references of this type.

There is also evolving jurisprudence to suggest that where relevant, Treaty principles could guide the actions of executive government and permeate domestic statutes without express incorporation. In addition, New Zealand is to some degree under an international obligation to maintain some of the rights ascribed to the Treaty, as Parliament has incorporated into domestic law the International Covenant on Civil and Political Rights which upholds the individual and group rights of minorities. Article III Treaty of Waitangi rights (the right to equality before the law) are largely protected under the New Zealand Bill of Rights Act and Human Rights Act.

Although there are limits on the extent to which Treaty rights can be argued in the courts system, as indicated above, the Waitangi Tribunal provides a forum for the hearing of historical and contemporary grievances regarding breaches of the Treaty of Waitangi. Under the Treaty of Waitangi Act 1975, any Maori may take a claim to the Tribunal that he or she (or the group to which he or she belongs) has been prejudicially affected by any legislation, policy or practice of the Crown since 1840. The Tribunal has the power to make recommendations to the Government. These recommendations are non-binding except in relation to particular assets, including forestry assets and other assets, owned or formerly owned by State Owned Enterprises and certain other state institutions.

The main means through which claims concerning historical breaches of the Treaty are settled is by direct negotiation with the Crown (through the Office of Treaty Settlements). This often occurs after the Waitangi Tribunal has issued a report on the grievance.

The Electoral System

The 1996 general election was the first held in New Zealand under the mixed member proportional system (MMP). Under the MMP system voters have two votes: a party vote and an electorate vote. Voters can choose what party they want in Parliament with their party vote and which person they want to represent their electorate with their electorate vote.

New Zealand is divided geographically into 61 general electorates and 6 Maori ones. There are also 53 seats for list MPs. The number of general electorates changes as the population changes. All voters live in an electoral area and vote in that same area. People of Maori descent can choose whether to be on the Maori or general electoral rolls. The Maori seats can change as the number of Maori voters on the Maori roll changes.

The Electoral Act 1993, which sets out the way the New Zealand electoral system works, is the only statute in New Zealand with entrenched provisions. Being "entrenched" means that if certain changes to the Electoral Act are to be made, for example the length of the Parliamentary term, they must be passed by either:

- 75 percent of MPs; or
- a majority vote in a referendum of all voters on the electoral rolls.

Usually a simple majority (51 percent) of MPs is all that is required to make changes to an Act.

The New Zealand Bill of Rights Act 1990

The New Zealand Bill of Rights Act 1990 safeguards the civil and political rights of New Zealanders.

The Act protects the following categories of rights and freedoms: life and security of the person; democratic and civil rights; non-discrimination and minority rights; search, arrest and detention; criminal procedure; and right to justice.

The Act is not higher law and does not "override" other laws, but it does nevertheless provide protection for the rights in it. The Courts must interpret other laws consistently with the Bill of Rights Act if at all possible. Further, all bills are assessed for consistency with the Bill of Rights Act before they are introduced into Parliament. Where there is an inconsistency in a bill, the Attorney-General must inform Parliament. While this does not prevent Parliament passing inconsistent laws, it does ensure that any issues are fully debated.

The Human Rights Act 1993

The Human Rights Act 1993 is aimed at giving all people equal opportunities and preventing unfair treatment on the basis of irrelevant personal characteristics. The Human Rights Act covers discrimination on the grounds of sex, marital status, religious belief, ethical belief, colour, race, ethnic or national origins, disability, age, political opinion, employment status, family status, and sexual orientation. It is unlawful to discriminate on these grounds in the following areas of public life: employment, education, access to public places, provision of goods and services, and housing and accommodation. People who think they have been discriminated against may complain to the Human Rights Commission.

GENERAL LEGAL SYSTEM INFORMATION

Civil and Criminal Law

There are two main divisions of law - **civil law** and **criminal law**.

Civil law covers disputes between individuals, companies and sometimes local or central government, and usually doesn't involve the police. The disputes usually involve money, with a wide range of cases coming before the courts - disputes over business contracts, wills, tax, land or other property; cases where negligence has caused another's loss; and family matters such as custody of children and division of matrimonial property. Many civil cases are settled without a court hearing being needed - all parties agree on a solution, usually after negotiations by the parties' lawyers. In a civil case, the plaintiff (the person who brings the action or "sues") must prove their case to the balance of probabilities - it must be more likely than not that the plaintiff's version of events is correct.

Criminal law has a high profile as it usually involves the police investigating crimes eg theft, murder, and trials which are often reported by the news media. The accused has the right to be represented by a lawyer and to have the evidence against him or her heard in an open court (open to the public) and tested by cross-examination. The offence must be proved beyond reasonable doubt. If convicted of a crime, a person will be sentenced in accordance with the law, and has a right to appeal against conviction and sentence.

Criminal prosecutions are usually brought by the police but are also brought by others, for example, the Ministry of Transport, Department of Inland Revenue and Local Authorities.

Court Proceedings

In the District Court and High Court the Judge sits alone or with a jury. A jury is made of 12 ordinary people selected at random from the jury roll (which is based on the electoral roll), and its role is to decide questions of fact. Various laws say when there has to be a jury, and when there is a choice to have one or not. Questions of law are decided by the Judge, who also directs the jury on the law where necessary.

In New Zealand courts the adversary system is usually used to determine issues. In this system, the Judge generally plays the role of a neutral referee while each party presents evidence and arguments (on the facts and on the law) in support of its own case. Rules of evidence determine what can and cannot be presented to the court. These rules are aimed at ensuring a fair trial of hearing for each party. The verdict (decision on the case) is given after all evidence and arguments have been presented. Where a person is tried without a jury, the verdict is given by the Judge.

An inquisitorial system similar to that used, for example, in France is used to a certain extent in administrative tribunals and commissions of inquiry. In this system the judge or person in charge takes a more active role, asking questions and in general the proceedings take the form of an investigation rather than a trial.

Legal Profession

In the New Zealand legal profession most lawyers are both barristers and solicitors. This means they are able to appear in court and deal directly with the public. A small number are barristers only ("barristers sole") who have chosen to specialise in arguing cases in court. Barristers in general do not deal directly with members of the public, and instead clients are referred to them by solicitors.

Legal Aid

A government funded Legal Aid scheme enables those who cannot afford legal representation to be represented by lawyers in both civil and criminal cases.

The New Zealand Parliament has one chamber, called the House of Representatives. The second chamber, known as the Legislative Council, was abolished in 1951.

One hundred and twenty Members of Parliament (MPs) are elected to the House of Representatives for a three year term. They meet in the Parliamentary Buildings in Wellington. New Zealanders aged 18 years and over, elect the Members of Parliament by voting in elections. This is how New Zealanders have a say in who runs the country.

The House's responsibilities are to debate and pass legislation, provide a Government, supervise the Government's administration by requiring it to explain policies and actions, supply money, and represent the views of the people of New Zealand. It has a number of Select Committees which examine proposed legislation (Bills) in detail, often hearing submissions from interested members of the public.

The Executive

The Executive is made up of the Prime Minister, Cabinet and the public sector. The Executive conducts the Government, deciding on policy and administering legislation.

All important Government policy decisions and legislative proposals either come from or are agreed to by Cabinet. Cabinet also co-ordinates the work of Ministers. Cabinet consists of Ministers who are members of the governing party or parties in Parliament and is presided over by the Prime Minister. Usually each Cabinet Minister is responsible for one or more government departments, but there can be Ministers "without portfolio", who do not have permanent responsibility for any department. Cabinet, like Parliament, has committees that examine specific subjects in detail. Cabinet Ministers are advised by public servants.

Although it has great power, Cabinet is not a body established by statute. Its power comes from long-recognised convention. In contrast, the Executive Council, which is formally constituted, does not have the power to make policy decisions. It gives legal effect to decisions made elsewhere, eg regulations, Orders and Notices. The Executive Council is presided over by the Governor-General and in practice the other members are the Cabinet of the day.

The Judiciary

The independence of the judiciary is an important principle of the New Zealand constitution, so freedom from political interference is an essential feature of the judiciary's position. This is reflected in the standing orders of the House of Representatives (their rules) which prohibit members from criticising a judge.

A judgement may be criticised but personal attacks on or attempts to influence a judge are not allowed, and could put the people concerned in contempt of court. If an MP does not like the decision reached in a case, the proper course is to introduce a Bill to change the law in question.

It is the Judges' role to apply the law to every case that comes before the Court. Judges, however, also develop the law by deciding what legislation passed by Parliament means by interpreting it. A growing area of the Judiciary's work is judicial review, examining the acts of government and private administrative bodies to see whether they acted fairly and within their powers.

Judges are appointed by the Governor-General. All judges are lawyers with at least seven years experience.

New Zealand's Constitution

A constitution is central to a country's legal system because it defines the principles on which the system is based. It sets up the most important institutions of government, states their principal powers and makes broad rules about how those powers can be used. In some countries the constitution is written down in one place and that document is called the constitution.

New Zealand's constitution, which is the foundation of our legal system, is drawn from a number of important statutes, judicial decisions, and customary rules known as constitutional conventions.

New Zealand does not have a single written constitution. New Zealand's constitutional arrangements can be found in a number of key documents. These, together with New Zealand's constitutional conventions, form the nation's constitution. Key written sources include the Constitution Act 1986, the New Zealand Bill Of Rights Act 1990, the Electoral Act 1993, the Treaty of Waitangi and the Standing Orders of the House of Representatives. Aspects of the constitution are also found in United Kingdom and other New Zealand legislation, judgments of the courts, and broad constitutional principles and conventions.

Constitutional Conventions

Constitutional conventions are rules that have become established by frequent use and custom. Conventions are an important part of the relationships between and within the legislature and the executive. Although some conventions have been put into statutes, most of them are not enforceable laws. Their continued existence depends on people respecting and obeying them. An example of a constitutional convention is that the Governor-General acts on the advice of his or her ministers.

The Rule of Law

The rule of law also forms a significant part of the New Zealand constitution. The principles of the rule of law are not easily defined, but encompass ideas such as:

- the powers exercised by parliamentarians and officials are based on legal authority;



Council of
Docked Breeds

Protecting the interests of the breed

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Update 29th June 2010 (figures updated 2nd July)

Dogs with docked tails significantly less likely to sustain tail injuries says Veterinary Record

Dogs with docked tails are significantly less likely to sustain tail injuries, finds research published in this week's Veterinary Record.

Among the 138,212 dogs seen by vets at the 52 practices during the study period, 281 were treated for a tail injury.

The owners of 224 of these injured dogs, as well as a random sample of 799 owners whose dogs had not been treated for tail injury were sent a questionnaire on dog tail injuries and docking.

Only 97 of the owners whose dogs needed treatment and 227 of those whose dogs had not been injured replied.

But their responses indicated that around one in three tail injuries (36%; 35 cases) had occurred at home as a result of the dog knocking its tail against a wall, kennel wall or other household object.

A further 27.6% (27 cases) were sustained outdoors, while 14.4% (14 cases) were caused by the tail being caught in a door or in a vehicle; other causes were cited, and at 10 (10.0%), the cause was unknown. Almost half of the injuries (44%) were recurrent.

Over half the cases were treated with drugs and dressings, but in almost one in three cases, amputation was required. Of 10 dogs that required surgery, treatment.

Dock tail breeds seemed to be more likely, with Springer and other spaniels almost six times as likely to sustain a tail injury as terriers and retrievers.

Greyhounds, lurchers, and whippets were almost seven times as likely to do so, possibly because of the lack of protection to the tail. The authors say the authors found that the risk of injury was almost four times as likely to be injured in this way, while the risk of injury to the tail was almost three times as likely to sustain a tail injury.

Only 35 owners whose dogs had had their tails docked, and on the basis of their overall findings, the authors calculated that tail docking would reduce the risk of injury by 12%.

PLEASE REMEMBER that the 281 dogs with damaged tails were from just 52 veterinary practices. According to the RCVS there are 3000 vet practices in the UK. If these 52 were representative of them all, then circa 16,000 dogs would have suffered tail injuries in the UK for that 12 month period and circa 5,000 would have undergone adult tail amputation! Even if it were 50% of this figure, this is nothing short of a scandal, resulting from an Act of Parliament that was designed to protect the welfare of animals.

The full official study in pdf format can be viewed [here](#).

The CDB responded as follows:

The CDB welcomed the research and was pleased to see that the research team had found what appears to be an excellent study. We certainly appreciate that collating worthwhile data from dog owners who are experiencing tail damage is not a simple task, due to their minds being concentrated on getting the dog well again and not on filling out paperwork. The data available to the research team is impressive.

Having said that, the timing of the research seems to be too early to establish the true effect of the tail docking ban which came into force early 2007. The research was carried out during March 2008 and March 2009 and tail damage cases were defined as any dog presented to veterinary practices within the previous 12 months (just as the ban had begun). The mean age of the controls was 4.2 years old and of the tail damage cases 3.8 years old, so the majority of dogs recorded were born before the ban came into force, when tail damage cases are expected to be far lower than since the ban.

It is our experience that damage is less likely to occur in undocked dogs before they have reached the age of twelve to eighteen months. Traditionally docked breeds ceased being docked early 2007 and the number of undocked examples being born slowly increased initially. At the time of the research, the new influx of previously docked breeds were still too young to add to the number of tail damage cases to get a true picture. The study accepts that it does not reflect differences in the risk due to the legislation.

We also note that there were 281 tail injuries recorded from a population of 138,212 dogs attending the 52 participating practices. From this it was deduced that the risk of tail damage was just 0.2% or that 500 docked dogs would only prevent 1 tail damage case. Unfortunately, this simply shows the risk as a percentage of the total dog population and does not represent the risk to undocked dogs in previously docked breeds. Conversely, a number of breeds shown to damage their tails were breeds which have NOT historically been docked.

We read with interest that undocked dogs were most likely to damage their tail in the home and that dogs which were NOT worked would be just as likely to damage their tails, both points have been put forward by the CDB for many years.

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The owners of 224 of these injured dogs, as well as a random sample of 799 owners whose dogs had not been treated for tail injury were sent a questionnaire on dog tail injuries and docking.

Only 97 of the owners whose dogs needed treatment and 227 of those whose dogs had not been injured replied.

But their responses indicated that around one in three tail injuries (36%; 35 cases) had occurred at home as a result of the dog knocking its tail against a wall, kennel wall or other household object.

A further 17.5% (17 cases) were sustained outdoors, while 14.4% (14 cases) were caused by the tail being caught in a door. In 15 (15.5%) other causes were cited; and in 16 (16.5%), the cause was unknown. Almost half of the injuries (44%) were recurrent.

Over half the cases were treated with drugs and dressings, but in almost one in three cases, amputation was required. Eleven dogs did not need any treatment.

Certain breeds seemed to be more at risk, with springer and cocker spaniels almost six times as likely to sustain a tail injury as labradors and retrievers.

Greyhounds, lurchers, and whippets were almost seven times as likely to do so, possibly because of the lack of protective hair on their tails, say the authors. Dogs with a wide angle of wag were also almost four times as likely to be injured in this way, while dogs kept in kennels were more than 3.5 times as likely to sustain a tail injury.

Only 35 owners said their dogs had had their tail docked, and on the basis of their overall findings, the authors calculated that tail docking would reduce the risk of injury by 12%.

PLEASE REMEMBER that the 281 dogs with damaged tails were from just 52 veterinary practices.

According to the RCVS there are 3000 verified vet practices in the UK. If these 52 were representative of them all, then circa 16,000 dogs would have suffered tail injuries in the UK for that 12 month period and circa 5,000 would have undergone adult tail amputation! Even if it were 50% of this figure, this is nothing short of a scandal, resulting from an Act of Parliament that was designed to protect the welfare of animals.

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From: Karen McMorran <5.9(2)(a)>
Sent: Wednesday, 4 May 2016 3:03 p.m.
To: Animal Welfare Submissions
Subject: requesting a longer consultation time frame for animal welfare regulations.

To the Hon Nathan Guy, Ministry of Primary Industries,

Regarding the regulations for animal welfare released for consultation in April 2016,

I do not believe you have allowed sufficient time for myself and other interested parties to adequately consider the issues that you have raised.

The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed over extensive areas of interest.

The lack of time allowed for submissions to be made indicates that your consultation process is not in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues.

In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you extend the time allowed for submissions or start the decision making process afresh, giving ample time to discuss each issue.

It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

While I think it is overdue that animal welfare regulations are being reviewed, rushing legislation through that has not been well thought out and consulted on further disregards the suffering of animals in NZ. Instead of preparing us for the future with robust policy, ensuring NZ is well regarded with our trading partners worldwide for its animal welfare, we will find ourselves mired in the mistakes of the past- where production and revenue were put well ahead of animal welfare. The present age of readily available information, and changing attitudes of consumers in first world countries in particular means we need to get this right for our animals and our animal product exporters. (I reference here my letter written to you on 20th April, 2016, which has been acknowledged, but not responded to).

More time is needed for individuals and groups to make submissions than is currently been allowed, and I respectfully request that this timeframe is extended.

Yours sincerely,

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Animal welfare proposed regulations feedback submission form

Your name: Luca Piuoso

Your organisation (if applicable): Aurora general Insurance

Your contact details: [Redacted] s 9(2)(a)

Your feedback: _____

I believe in a moral baseline that allows all creatures of God's earth a right to life. killing should only be allowed in self defense.

Killing for an increase in pleasure of the palate (a minor increase - as vegan food is delicious) can never be moral.

Once upon a time, killing for food was moral, as it may have preserved human life through winter. In today's world, of international trade + year round crops, we do not need to allow animal murder.
It's a new age.

Feel free to continue your submission on additional paper and staple it to this form.

Please place your feedback inside the feedback box. Alternatively, take this form with you and post your feedback to Animal Welfare Policy, Ministry for Primary Industries, PO Box 2526, Wellington 6140.

You can also email your feedback to animal.welfaresubmissions@mpi.govt.nz

Submissions close 5pm 19 May 2016.

Any submission you make becomes public information. Anyone can ask for copies of all submissions under the Official Information Act 1982 (OIA). The OIA says we must make the information available unless we have a good reason for withholding it. You can find those grounds in sections 6 and 9 of the OIA. Tell us if you think there are grounds to withhold specific information in your submission. Reasons might include, it's commercially sensitive or it's personal information. However, any decision MPI makes to withhold information can be reviewed by the Ombudsman, who may require the information be released.



Animal welfare proposed regulations feedback submission form

Your name: MARTY DEANS

Your organisation (if applicable): NEW ZEALAND RODEO CLUBBOYS ASSN

Your contact details: s 9(2)(a)

Your feedback: _____

APPROVE THE REMOVAL OF 29. RODEOS - FIREWORKS

VERY APPRECIATE OF THE SUPPORT MPI HAS GIVEN TO
THE NZRCA OVER MANY YEARS WITH WRITING THE
CODE OF WELFARE (RODEO) & DEALING WITH ANTI-RODEO PEOPLE.

TOTALLY AGREE WITH TAIL TWISTING BEING BANNED

Feel free to continue your submission on additional paper and staple it to this form.

Please place your feedback inside the feedback box. Alternatively, take this form with you and post your feedback to Animal Welfare Policy, Ministry for Primary Industries, PO Box 2526, Wellington 6140.

You can also email your feedback to animal.welfaresubmissions@mpi.govt.nz

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From: bijoux miller <89(2)(a)>
Sent: Wednesday, 4 May 2016 10:23 a.m.
To: Animal Welfare Submissions
Subject: A spiritual persons insight into todays animal welfare act

Begin by following my logic... it will help you understand better where my essay on animal rights and the welfare act is coming from:

How can we have free will and yet have a supreme creator and controller, God? Compatibilist free will is the Biblical, Hindu and Islamic position. Compatibilism is the belief that free will and determinism are compatible ideas, and that it is possible to believe in both without being logically inconsistent. Arthur Schopenhauer famously said (as paraphrased by Einstein) "Man can do what he wills but he cannot will what he wills." As though your own harmony is already stirred within you by the star maker, but you must sing the song yourself... or like wave-particle duality- two faces to the nature of ultimate reality.

So here's my analysis for the journey to co-create God's heaven on earth where the lion and lamb lie down together. Animals apart from humans are not intended to know specific parts of the mind of God. Share in God's love, play and affection yes, but not properties like creative potentiality and stewardship of the planet. These lie with humans.

Humans are called to engage in moral choices, to understand good and evil. So, we begun with examining God's structure for bodies, why is it a belly rub feels good, and a knife to the belly feels bad? God has created a challenge, to equip us with behavior styles that eventually allow us to express loving kindness. There could be perfect creative play without any harm, but the possibility of pain leads us to learn about choice-- pain exists because of perfect creative potential that God has. Not because God is evil, but because in pure freedom, it's found that if you choose so, you can hurt yourself or others. So it's part of the awesome power of total and absolute choice.

Of course, we want to build a heaven where we are only in theory pain capable, and never have to experience, where all choice can be synergistic for each and every being. It is evolution's challenge to evolve our consciousness to the type of being that can play with pure creative power, and yet sustain a flawless moral code...

So, here we are now at a suitable level to begin to test our muscle for kindness to animals. Basically, for most purposes, you should do what feels good in life- naturally! So, the lesson to deduct pleasure functions for the sake of others less powerful than you, comes in only a later stage un humanities evolution where the soul is suitably ready for it. It's only a task to complete, much like self restriction for the sake of achieving a personal success, or self restriction for the success of someone you dearly love like partner or child, self- restriction for some unknown animal facing the terror and blood of the slaughter house is the same principle- do it because you are a lover at heart and you will chose what is loving kindness when it is important!

Because this animal is both a stranger, and completely behind closed walls never for you to see, it is a considerable mental exersize, whereas yourself you constantly feel for- it's the easiest one to learn to love the self- and your children-there is that direct heart-based feedback- so once again, it is easier to make the choice, and the connection to do what is right.

Incase we begin to view God as only Christian in purity God is in all religions, in pieces of shimmering divine light

The precept of being vegetarian is the fundamental of Tao, and is a bridge of truth, which crosses the ocean of births and deaths, between the ferry and the other shore of liberation.

If you wish to learn Tao, you should be a vegetarian and keep the precepts, and your every single thought should be righteous and Real, then the evils and delusions will vanish of themselves.

Most living beings had abandoned the pure realm and are indulging in meat-eating, this defiles both their bodies and minds, They are like the hungry ghosts who eat dead bodies but cannot extinguish the fire that are burning their hungry intestines so that they can never eat their fill; they are also like the flies and worms who scramble for putrid and stinky things and stay still on them as if those are sandalwood.

In a meat eater's body, the three palaces are turbid, and the six viscera are defiled, the dark souls (PUG) of the dead bodies (that he ate) are exciting and thriving, and are always willing to guide him to the place of death.

Therefore, you should cut off the root of desires, enter into the pure and tranquil state, do not put any living being into suffering, do not commit anything evil, do not produce any delusions, and do not arouse any evil from your heart.

You should regard the precepts as the laws of the world, when you want to violate any of them, you should be aware of the punishment with fear. You should uphold the teachings of the precepts sincerely and respectfully, keep the precepts solemnly as if they are in front

of you, and as if you are facing something that you fear. You should keep your heart righteous and solemn, eliminate all thoughts, and listen attentively to the non-dual, then you will be able to experience the Correct Truth, and become my disciple. So where am I?

for the practical application of your forces:

Abolish diet of animals

The justifications for the murder of living animals to consume their dead bodies are always the same, its well documented the 4 deadly Ns

NORMAL: on this grounds, slavery, oppression of women, racism and tribal warfare should all be bought back, as they were once normal. Normal behavior is not always right, Nazi normalcy anyone?

NICE: people believe as meat can taste good(usually only if fire is used) that this must make it right. On this account, a man can rape a woman if it feels nice, or a person can take a slave because it feels nice to do less work. the real you should not be this shallow and uncaring, meat nice to your taste buds is not nice to your love for life's innocent animals. Listen to your heart not just your tongue for a second? Also, vegan is a cuisine, like Indian or Thai it takes picking up a cook book!! read a recipe book rather than think of the missing meat in your usual recipe. Don't think it isn't nice! to taste and the hearts true tenderness.

Those as children will enter the kingdom of Christ. What child would will an abattoir when they can eat fruit?

NATURAL: because cats and other animals have to do it due to biology or environment humans must follow the carnivorous animals. Animals also breath in water, fly. They also don't shop in grocery stores of a million choices. Once again, the natural supremacy of whites over blacks or men over women has been wrongly argued throughout history. Humans don't have "the right" to kill animals. It's not "personal choice", you are taking someone else's life. Personal choice is those actions affecting you and you alone, harming no-one else.

NECESSARY: This is a frightening nutritional ignorance that makes people think they so vitally need dead meat for protein and iron, and dairy for calcium at the expense of animals lives. It's horrendously perpetrated by the meat and dairy industries. You don't need to kill a calf for his mothers milk anymore than you need to take giraffes milk. Harvard medical school have shown high dairy consumers have the worst bones of the globe due to the acidic levels of cows milk leeching out more calcium to neutralize human blood PH than the milk in fact contains. World health experts found Heme iron in meat -the supposed wonder iron- is linked to up to 40% increase in cancers of all types for humans. This doesn't stop the industry advertising in hospitals. That's how profit driven these people are. Protein consumption needs are faultlessly met from a plant based diet. Vegan body builders can attest to this. Vegans live longer than meat eaters and lower B12 is a modern society phenomenon not exclusive to vegans. B12 is created by bacteria that the huge doses of antibiotics used in factory farmed meat and dairy kill off. It's actually the animal feces that contain the presence of B12 in animal foods because of intestinal bacteria. Soil used to be our natural source of B12 but the destruction of organic farming has led to problems with chemically laden soil remaining on crops. Anyway, fortified B12 soymilk is better than all those suffering dead animals.

So before you kill another innocent life, try thinking which of the N's you are using to justify murdering another: should it be normal, nice, natural and necessary? N is your answer: NO!!

Try vegan, 2016...practice kindness.

As a final note, over the 5 years or so of meat elimination, I have broken that vow a few times. Primarily, I was struggling with self and other love, and had too little peace interiorly to seek a vegan convenience food store when it was late, or to prepare my own meals. In these cases in life, I don't expect people to go against the grain, it's like asking a broke person to give \$2 to charity, it should constantly be expected of those who can, but not of those running on empty at certain moments we can all forgive weakness. But not of those who can do better and now know better. Then, it is murder and selfish sin.

From: Samantha Fairley <9(2)(a)>
Sent: Wednesday, 4 May 2016 10:09 a.m.
To: Animal Welfare Submissions
Subject: animal welfare conditions currently

Dear MPI,

I want to take the time to share what I have learned about the rights of animals, and how it fits into the entire spectrum of the evolution of mankind.

Right to life is a constructed concept- the basics for the happiness of an individual to be possible. The very first step,

Not that long ago, slaves did not have this basic right. Slavery was a business model built on the fact that many jobs in life were not that fun, so it was simply more pleasurable for those in power to give the tiring jobs to slaves. Slaves had no essential right to life. If slaves were unfit to carry out duties they were routinely killed. Their entire lives were spent serving their masters.

What we as a society have now done is enslave animals. They exist and are bred into slavery and often also into prisons and continue to serve us until we deem it time for their bloody end.

We have no inbuilt morality, and concepts such as rights take time and effort to construct, by analysis and recourse to previous examples, and by striving to be people of God, or simply, people of a kind and loving nature.

So, I essentially want to press that the foundation of the entire welfare act as it is, is weak. Yes, we recognize that animals are sentient beings capable of pleasure and pain and this is a step. But we are no where near where we need to be. Animals should not be killed for human superfluous pleasure. Vegetarian food is abundant nowadays, and also delicious! drop in at tart bakery in greyllynn if you don't yet believe me! Try a spinach and vegan cheese pie, or a not chicken-thai pie, or a vegan strawberry cream donut! Have a drink of little island strawberry coconut milk!

Nothing can make the removal of babies from their mothers to die almost immediately after being born a decent thing. No small shift in the number of days it can spend with her is worth very much, if he is still carted off to the knife, as she runs after him crying for him....
all because we run away screaming from Organic Vitasoy milk!!

How very bizarre and cruel the slavery business is. It's like we are avoiding a perfectly good washing machine in favour of a slave boy-our dear bobby and his murder!

We make avocados cost several dollars when these grow so easily, because we are taken with the business of murder instead-ruining all our environment in the process. We think animal food brings in money-but any food grown in such quantity would do this!! Avocados are just one example. Such mistakes! Such errors! Indeed dairy is costing money to make nowadays...it's truly time for a deep change.

Meat tastes good to the human palate-not many deny this. Unfortunately, rape also feels good, and taking a slave can be easier than chores. It isn't right, and we should as many steps to destruct our cruel business of slaughter as possible.

Because of human creative intelligence, striving towards a better way,

great things are already here, try a fry's burger patty- it can actually legitimately replace a Big Mac patty in flavour! Try a Tofurky pastrami slice in place of a piece of ham! Things are here for us, moral substitutes, and it's time we implement them, as soon as we can on a proper scale for everyone.

In the USA we have Beyond meat recreating the exact texture and flavour of chicken from plants!! we have solutions now, and the right thing to do is put the animals out to pasture and leave them with their babies in peace...and stop forcefully breeding more.

The sooner we finish all and every form of slavery, the better for us, as souls, as hearts, as moral citizens; even, it seems, in the latest Harvard studies, in health!

I'd like to finish with quotes from great human minds

from Albert Einstein:

"Nothing will benefit humans or increase the chance of our survival than the evolution to a vegetarian diet"

From Leonardo Da Vinci

"My body will not be made a tomb for other living creatures"

Finally,

Maya Angelou

"do the best you can. And then, once you know better, do better."

Sincerely yours,
Samantha Fairley

7

From: Samantha Fairley s 9(2)(a)
Sent: Thursday, 12 May 2016 12:20 a.m.
To: Animal Welfare Submissions
Subject: In support of the abolishment of killing animals for pleasure

The demand for the abolition of meat has taken a long time to emerge, because it was thought that a largely carnivorous population would not understand, and would react with hostility to any demand for prohibition. And all the while, with every investigation revealing the horrendous suffering of animals destined to be eaten, with every increase in specific demands (outlaw force-feeding, don't eat factory-farmed chicken, etc.), the meat industry has tried to make people worried by warning them: "Look out, this campaign is being led by a handful of vegetarians who want to *impose* their ideas!"

The contrast between the obligations that humans recognise having towards animals, and the way in which they actually treat them, does not imply that their declared good intentions are just hypocritical. What we learn from this contrast, however, is that spontaneous changes in consumer behaviour are not sufficient to put an end to the butchery. There are reasons for this. The situation is familiar: the problems of road safety, pollution, human poverty or child abuse cannot be solved just by relying on the capacity of each person to modify their habits to remedy the situation, even when they are generally acknowledged to be wrong.

To bring to an end the hideous fate reserved for animals that are eaten, the question should also be asked on the political level. A process must be begun which will finish by laws being passed to ban predation (hunting and fishing) and production (farming) of animals for human consumption. Public institutions have also a role to play in the retraining of workers whose incomes depend on these activities. This process begins by the public expression of the demand for the abolition of meat.

Me and my family, s 9(2)(a)

, we would
love to see the law protect animals fully, not partially.

thanks for your time

From: Rita Grenyer <9(2)(a)>
Sent: Wednesday, 4 May 2016 2:21 p.m.
To: Animal Welfare Submissions
Subject: tail docking

To whom it may concern.

I bred and exhibited Rough Coated Collies under the Lochmaben prefix in the 1970's, worked for NZKC for approx 3 years, was a licensed Judge of the Working dog group, am a life member of The Collie Club and have been an active committee member of The Rottweiler Club, having bred 36 Champions in this breed since 1986.

I am also a qualified bander with NZCDB.

Prior to the change of policy I always had my rottweiler pups docked by a veterinarian with no problems. I was the first one to be horrified when docking was banned and believed that our breed would end up looking like the local farm dog. How wrong I was.

Since making my annual pilgrimage to the Australian Rottweiler National Show I have realised just how great my breed looks with a tail and how the true rottweiler breeder stuck with the breed at this time.

I have now heartily accepted and come to love the tailed rottweiler.

FCI Specialist Judges now find it difficult to judge docked dogs at these Specialty Shows and will invariably not grade them or place them at the rear of the class.

A disturbing fall out of us still able to remove tails in this country is the fact that some breeders are breeding back to back litters and breeding specifically for the lucrative pet market in Australia. Often these pups are not NZKC registered. This flooding of the Australian market with docked puppies is disturbing to the Australian breeders. Obviously this is not just happening with Rottweilers but other docked breeds as well.

All the while banding is legal in New Zealand I am pressured by public preference to band my puppies tails as the playing field is not a level one.

I sincerely hope that one day soon I can leave the tails on my precious babies.

Since banding my own pups I have had two with infections and have heard of serious issues from other breeders in regard to banding. I personally believe that docking by a veterinarian to be more humane. I have found that serious discomfort is displayed 2 hours AFTER the initial banding (thus allowing onlookers to believe banding is painless), a good 10 hours on from then puppies are whingy and obviously in much discomfort and then it begins to wane until the tails detach.

Other breeders I have spoken to encounter the same pattern.

I urge MPI to have the courage to ban removal of tails except for good reason, but please allow veterinarians to remove rear dew claws.

Yours sincerely,

Rita Grenyer.

9

Out of Scope

From: cyd welsh s 9(2)(a)
Sent: Wednesday, 4 May 2016 11:43 a.m.
To: Animal Welfare Submissions
Subject: Submission re Animal Welfare Act

Please find below my submission regarding this Act which is currently under review.
Submissions must be in by May 19.

I would appreciate an email letting me know this has been received.
Thank you
Cyd Welsh

4 May 2016

Ceinwen (Cyd) Welsh

s 9(2)(a)
[Redacted]
[Redacted]
[Redacted]
[Redacted]

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Re: Animal Welfare Regulations Submission

Introduction

1. The purpose of this submission is to comment on proposed Animal Welfare Regulations. The Ministry for Primary Industries (**MPI**) seeks feedback on proposed regulations intended to improve the current animal welfare system.
2. This submission is made by Ceinwen Welsh

The following organisation support this submission

New Zealand Council of Docked Breeds (**NZCDB**)

3. The contact person for this submission is:

Name: Cyd Welsh

Address: § 9(2)(a)

Contact Phone: § 9(2)(a)

Email: § 9(2)(a)

General Comments

4.
 - a. I have owned and bred Weimaraners since 1981 so have an extensive knowledge of the breed, its uses and what works and what doesn't work. I have shortened tails and

removed dew claws from different breeds since 1993 and am currently an Accredited Bander on the NZCDB list..

I consider that I have banded more puppies and removed dew claws than the majority of Veterinarians who are untrained in the practice.

I consider that from my experience in the dog world, this places my observations uniquely above many of the veterinarians in New Zealand.

I support the Submission made by the New Zealand Council of Docked breeds.

- b. I am a Registered nurse and a Registered Midwife so have a unique and indepth knowledge and understanding of mammalian health and wellbeing.
- c. I have concerns with changes to the Act which will prohibit the shortening of puppies tails and also prohibit the removal of dew claws.
- d. I believe the NZCDB has excellent expert evidence. And I have heard many horror stories of the suffering dogs go through when they need to be docked as adults. Also the risk to their lives when a dew claw is caught while accidentally and ripped out complete with artery is unacceptable..
- e. I have had photos sent from a breeder in Australia taken of the inside of a dog trailer where one unfortunate dog damaged his tail so badly the inside of the trailer was covered in blood.
- f. I believe that the Act should remain as it is with no changes to tail banding and dew claw removal.

Conclusion

- 5. Our organisation seeks both appropriate care and welfare standards for all animals including dogs. We however consider that the proposals as set out may have other unintended implications which in and of themselves will not meet the intent or care standards proposed. We suggest that as long standing dog breeders we and our members will be well placed to assist officials and at the very least should not be ignored.
- 6. We welcome any questions the Ministry may have with respect to this submission. We are available also to meet should this be helpful.

Cyd Welsh

Midwife

s 9(2)(a)

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

10

Out of Scope

From: Philip Armstrong <s9(2)(a)>
Sent: Wednesday, 4 May 2016 9:32 a.m.
To: Animal Welfare Submissions
Subject: re time permitted for consultation

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016.

I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Yours sincerely

Philip Armstrong

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Pamela Nunn § 9(2)(a)
Sent: Wednesday, 4 May 2016 9:17 a.m.
To: Animal Welfare Submissions
Subject: Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016.

1) I do not believe you have allowed sufficient time for concerned members of the public to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks. I have to say that I do not believe your consultation process has been in good faith.

2) I would bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

In consequence, I request that you formally extend the submission period, to facilitate a more genuine and useful consideration of these issues.

3) I am concerned about the continued use of farrowing crates in pig-farming, the callous disposition of bobby calves, the use of animals in rodeos (which I believe should be banned in this country if they are not fundamentally reviewed and made subject to rigorous animal-welfare regulations) and the readiness of the Ministry to allow conditions of animal export that go against the welfare standards most New Zealanders want in order to ensure that trade occurs. But the short time allowed at present means I am unable to muster the information that would underpin detailed arguments on these important matters.

Yours sincerely,

Pamela Gerrish Nunn

§ 9(2)(a)

12

Out of Scope

From: Leigh Donohue § 9(2)(a)
Sent: Tuesday, 3 May 2016 4:46 p.m.
To: 'animal.welfaresubmissions@mpi.govt.nz'
Subject: FW: Submission on Animal Welfare Regulations - 2016

Follow Up Flag: Follow up
Flag Status: Flagged

Hi

I wish to make a submission as per below – I have English Cocker Spaniels and believe they should have their tail docked for the very same reasons that the writer below indicates

Regards
Leigh

Leigh Donohue
§ 9(2)(a)

From: Coralee Jones (ADHB)
Sent: Tuesday, 03 May 2016 11:31 a.m.
To: Leigh Donohue (ADHB)
Subject: FW: Submission on Animal Welfare Regulations - 2016

Please take the time to do a submission and tell as many people as you can to do the same

From: Coralee Jones (ADHB)
Sent: Tuesday, 03 May 2016 11:28 a.m.
To: 'animal.welfaresubmissions@mpi.govt.nz'
Cc: 'n.guy@ministers.govt.nz'; 'winston.peters@parliament.govt.nz'
Subject: Submission on Animal Welfare Regulations - 2016

Coralee Jones
§ 9(2)(a)

2nd May 2016

Animal Welfare Policy
Ministry for Primary Industries
P O Box 2526
Wellington 6140

Submission on Animal Welfare Regulations 2016

Proposed Animal Welfare Regulations (Care & Conduct and Surgical & Painful Procedures) MPI
Discussion Paper No: 2016/12
12.0 Surgical and Painful Procedures Regulatory Proposals
62. Dogs – Tail docking

My name is Coralee Jones and I have bred Australian Shepherds (no tail) for 19 years and Rough Coat Collies (full tail) for 39 years.

Australian Shepherds have been docked since the inception of the breed, I am a member of the New Zealand Council of Docked Breeds, the New Zealand Kennel Club and the Auckland Working Dog Association.

I would like to have my submission considered for the proposed possible amendments to the Animal Welfare Policy 2016 and make my submission on the following issues.

Tail Docking of dogs (under the misconception of Surgical and Painful procedures)

I believe that the Banding of Dogs Tails should continue to be considered a Controlled Procedure and that only people who are members of the accredited Banding Scheme are permitted to perform.

The reasons for this are as follows:

If banding is done correctly it is relatively pain free and is minimally distressing to the pup as at that age the skin is soft and pliable, contrary to the emotive but ill-informed pronouncements of the anti-docking campaigners, please view this procedure on the New Zealand Council of Docked Breeds site www.nzcdb.co.nz/about-tail-banding.html and then view Circumcision of human male babies and tell me should this also be banned as the same could be said for it, how often does infection occur compared to the number of circumcisions performed

"The scientific view that puppies less than 10-days old are insufficiently developed in their nervous systems to feel pain in their tails is supported by: Professor Rudolf Fritsch (Head of Veterinary Surgery Clinic, Justus-Liebig University, Germany; Professor D. Grandjean, Veterinary School of Alfort, France"

I also refute the argument/stats about adult dog amputation of tails as any adult dog tail amputation cannot be compared to a puppy tail docking as far as a procedure goes.

I find thousands of reports from vets and owners of tail damage – just like this link www.cdb.org/letters.htm

The negative docking experiences that SPCA report are from non NZKC registered, ignorant people breeding dogs with no knowledge and certainly not done by an accredited tail docking person and no matter what legislation you bring in that will continue so the only people this legislation will effect are the good breeders who truly care for the breeds they are involved in.

Currently there is freedom of choice on banding or not banding and I feel it needs to remain this way as there is no evidence based data to support the need to impose a ban

BASC for one are pressing for an amendment (review 2016) to allow docking and quote the Glasgow University research which supports the experiences of working dog owners that tail injuries are a significant problem the could be prevented, they go on to say "Working dogs in Scotland are suffering because of this legislation. Quality, working breeding lines have all but disappeared as caring owners are not prepared to subject their dogs to potential injury that could lead to tail amputation"
<http://basc.org.uk/blog/press-releases/latest-news/basc-urges-working-dog-owners-to-speak-out-on-tail-docking/>

Australian Shepherds, are a (NBT) natural bob tail breed and they are structurally built to work without a tail, with incredible speed and turning ability, the structure of a dog changes if they have a tail, which in turn changes the way they can work.

Having both tailed and NBT/docked breeds, I dispel the theory that body language is an issue, there is no difference in the dogs attitude, ability to communicate or balance for dogs with or without tails and I have never had any of my docked or NBT dogs with incontinence as implied either.

59. Dogs – Dog debarking (and devoicing of other species)

Debarking is a better option than a dog being put to sleep, sometimes no matter what a person does a neighbour can't tolerate a dogs bark even when it is not a nuisance bark so it can come down to a life or death situation so I feel the current regulations allow for this kind of situation.

Yours sincerely

Coralee Jones

s 9(2)(a)

From: Coralee Jones (s 9(2)(a))
Sent: Tuesday, 3 May 2016 11:28 a.m.
To: Animal Welfare Submissions
Cc: n.guy@ministers.govt.nz; winston.peters@parliament.govt.nz
Subject: Submission on Animal Welfare Regulations - 2016

Follow Up Flag: Follow up
Flag Status: Flagged

Coralee Jones
s 9(2)(a)

2nd May 2016

Animal Welfare Policy
Ministry for Primary Industries
P O Box 2526
Wellington 6140

Submission on Animal Welfare Regulations 2016

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If banding is done correctly it is relatively pain free and is minimally distressing to the pup as at that age the skin is soft and pliable, contrary to the emotive but ill-informed pronouncements of the anti-docking campaigners, please view this procedure on the New Zealand Council of Docked Breeds site www.nzcdb.co.nz/about-tail-banding.html and then view Circumcision of human male babies and tell me should this also be banned as the same could be said for it, how often does infection occur compared to the number of circumcisions performed

"The scientific view that puppies less than 10-days old are insufficiently developed in their nervous systems to feel pain in their tails is supported by: Professor Rudolf Fritsch (Head of Veterinary Surgery Clinic, Justus-Liebig University, Germany; Professor D. Grandjean, Veterinary School of Alfort, France"

I also refute the argument/stats about adult dog amputation of tails as any adult dog tail amputation cannot be compared to a puppy tail docking as far as a procedure goes.

I find thousands of reports from vets and owners of tail damage – just like this link www.cdb.org/letters.htm

The negative docking experiences that SPCA report are from **non** NZKC registered, ignorant people breeding dogs with no knowledge and certainly not done by an accredited tail docking person and no matter what legislation you bring in that will continue so the only people this legislation will effect are the good breeders who truly care for the breeds they are involved in.

Currently there is freedom of choice on banding or not banding and I feel it needs to remain this way as there is no **evidence based data** to support the need to impose a ban

BASC for one are pressing for an amendment (review 2016) to allow docking and quote the Glasgow University research which supports the experiences of working dog owners that tail injuries are a significant problem the could be prevented, they go on to say “Working dogs in Scotland are suffering because of this legislation. Quality, working breeding lines have all but disappeared as caring owners are not prepared to subject their dogs to potential injury that could lead to tail amputation”
<http://basc.org.uk/blog/press-releases/latest-news/basc-urges-working-dog-owners-to-speak-out-on-tail-docking/>

Australian Shepherds, are a (NBT) natural bob tail breed and they are structurally built to work without a tail, with incredible speed and turning ability, the structure of a dog changes if they have a tail, which in turn changes the way they can work.

Having both tailed and NBT/docked breeds, I dispel the theory that body language is an issue, there is no difference in the dogs attitude, ability to communicate or balance for dogs with or without tails and I have never had any of my docked or NBT dogs with incontinence as implied either.

59. Dogs – Dog debarking (and devoicing of other species)

Debarking is a better option than a dog being put to sleep, sometimes no matter what a person does a neighbour can't tolerate a dogs bark even when it is not a nuisance bark so it can come down to a life or death situation so I feel the current regulations allow for this kind of situation.

Yours sincerely

Coralee Jones

s 9(2)(a)

14

From: Robyn s 9(2)(a)
Sent: Monday, 2 May 2016 11:40 a.m.
To: Animal Welfare Submissions
Subject: Painful Animal Husbandry - use of Pain Relief when Disbudding Calves
Follow Up Flag: Follow up
Flag Status: Completed

To Whom it may concern,

We support the amendment to the Animal Welfare Act. We, as a franchised operation, have been using local anaesthetic as our preferred method of pain relief to calves when disbudding them, for over 20 years. Our concerns in relation to the proposals are based on our current experiences when trying to obtain & use the Anaesthetic & Spray on Antibiotic. These concerns are:

- Unreasonable certification cost by veterinarians of our technicians to administer the local anaesthetic on an annual basis
- Unreasonable cost of local anaesthetic & spray on antibiotics (such as tetravet or Aerotet forte) Ranging from \$30 -\$200 for a 500ml packet of Local Anaesthetic
- Access to Local anaesthetic (some veterinarians simply not certifying our disbudding technicians & thereby not allowing access to the drugs) thereby totally prohibiting our technicians from using our preferred method of operation & forcing them to remove the horns with NO pain relief.

As a group we would like the opportunity to speak on these concerns to those making the amendments to the Act. Our nominated spokesman for the Franchise Group is Kevin Westbury - Franchisor and he can be contacted on s 9(2)(a)

Thank you.

Robyn Edwards
Ultra-Scan Central Plateau
s 9(2)(a)



From: Robyn <9(2)(a)>
Sent: Tuesday, 3 May 2016 3:16 p.m.
To: Animal Welfare Submissions
Subject: Ultra-Scan - Submission re Painful Animal Husbandry - Calf Disbudding - Revised Submission

Follow Up Flag: Follow up
Flag Status: Flagged

Submissions were forwarded by Kevin Westbury and Ultra-Scan Central Plateau regarding Calf Disbudding over the past 2 days.

We would like to revise both submissions with the following - thank you.

To Whom it May Concern

Ultra-Scan is a group of 21 Franchisees represented throughout New Zealand. As a group we disbud in excess of 220,000 calves per year and we believe that we account for the single largest group undertaking this procedure within New Zealand. The recognised Ultra-Scan method of disbudding calves includes the use of pain relief in the form of local anaesthesia administered through the corneal nerve. This has been standard practice within the Ultra-Scan franchise group for the past 20 years. In order to obtain local anaesthetic our Franchisees are required to be certified to administer this drug by a registered Veterinarian - a position we fully endorse and approve of. Our focus has always been, and continues to be on the welfare of the calves. As such we fully support the Dairy NZ initiative to have the use of pain relief during the disbudding of calves mandatory. It is important that any person undertaking disbudding be certified in the administration of pain relief, whether it be Contractors to the Vets, Technicians or Farmers.

While supporting this change to the Painful Animal Husbandry Act the following issues also need to be addressed in respect of our ability to procure both local anaesthetic and the antibiotic spray -Tetravet or Aerotet Forte. A number of our Franchisees continue to experience issues when dealing with local veterinary practices in regions such as Southland, Ashburton and Canterbury where they are unable to procure either product:

- Unreasonable certification cost by veterinarians of our technicians to administer the local anaesthetic on an annual basis

- Unreasonable cost of local anaesthetic & spray on antibiotics (such as tetravet or Aerotet forte)
Ranging from \$30 - \$200 for a 500ml packet of Local Anaesthetic

- Access to Local anaesthetic (some veterinarians simply not certifying our disbudding technicians & thereby not allowing access to the drugs) thereby totally prohibiting our technicians from using our preferred method of operation & forcing them to remove the horns with NO pain relief.

We welcome the proposed changes to the Animal Husbandry Act to ensure that pain relief for the disbudding of calves becomes mandatory. We would welcome the opportunity to discuss this issue and the associated challenges we face with the appropriate persons at MPI. Please do not hesitate to contact Kevin Westbury on s 9(2)(a) if you have any queries regarding this submission.

Thank you and Regards

Robyn Edwards

Robyn Edwards
Ultra-Scan Limited

s 9(2)(a)
[Redacted]
[Redacted]
[Redacted]
[Redacted]



RELEASED UNDER THE OFFICIAL INFORMATION ACT 1992

From: Alexandra <9(2)(a)>
Sent: Tuesday, 3 May 2016 3:53 p.m.
To: Animal Welfare Submissions

Follow Up Flag: Follow up
Flag Status: Flagged

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision-making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, hobby calves, animals in rodeo, and live exports in five weeks.

-Alexandra Simpson

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Received

4 May

(16)

3 April 2016

Anne-Marie Reid

§ 9(2)(a)

Re: Animal Welfare Regulations Submission

The purpose of this submission is to comment on proposed Animal Welfare Regulations. The Ministry for Primary Industries (MPI) seeks feedback on proposed regulations intended to improve the current animal welfare system.

This submission is made by Anne-Marie Reid
The following organisation support this submission

New Zealand Council of Docked Breeds (NZCDB)

Commented [LL1]: Determine which you want to use based on how you work with the other organisations

The contact person for this submission is:

Name: Anne-Marie Reid

Address: § 9(2)(a)

§ 9(2)(a)

Contact Phone: § 9(2)(a)

§ 9(2)(a)

Email: m § 9(2)(a)

General Comments

I am a Rottweiler breeder and have been for 16 years. Most of my puppies are docked a dew claws removed at 1 day old. The tails are banded by myself an accredited bander and belong to the Council of Docked Breeds NZ. Approximately over 200 puppies I have banded and dew claw removed over the years.

My puppies are banded while on their mother drinking and they don't show any reaction and continue to feed off mum.

I remove dew claws because at this age it is easier and less stress for the animal than to have surgery and have them amputated when older. I am rural and my dogs run up and down hills, in and out of the dam, and put their paws through fencing and rip the dew claws if they are left on. This then means I can't show them as they are lame for some time and that means I can't exhibit my dogs and participate in my hobby.

At 1 day old I don't know which puppy I am keeping so they all (usually) get removed. This is a very simple procedure with a Kelly (Haemostat) clamp and some suture glue. The clamp pops the un attached claw upwards and the clamp self quarterises so usually no bleeding at all. After a minute I use my nail and flick the claw off and apply some suture glue to keep germs out and to ensure the skin stays closed. This results in virtually no scarring.

This process is much less invasive than having surgery as an adult and having the claw surgically cut and ground off the bone.

I have left tails on the odd time at the request of a puppy purchaser. I have noticed no difference in the development from the docked puppies and the tailed ones. I also have imported a few dogs from overseas and they have their tails. Swimming is the same there is no difference between the docked and un docked. Running and playing and balance also there is no difference. The only difference is when the tailed dogs get wet while swimming etc, I have to ensure their tail is dried thoroughly otherwise they have been prone to dead or wet tail as some call this. This is very painful for the dog and they require anti inflamitories and tail massage. This causes the dog a considerable amount of distress and again means that I can't exhibit them which prevents me from my hobby.

If the tail docking ban goes ahead I can see many more vet visits and extra costs. As in wet of dead tail and dew claw injuries. All of which are preventable. Or not take my dogs near water which means they are not enjoying life as they should.

My dogs are also therapy dogs in a rest home and the tailed dogs aren't preferred as the wagging tails cause bruising on the elderly that have very delicate skin on their legs, and the docked dogs have been requested.

I believe the regulating and penalties of unlawful banding and dew claw removal is required for all not just the pedigree dogs. Perhaps certification from an accredited tail bander and closer monitoring of trade me by animal control to police this. I know a few vets when vaccinating puppies that have been docked and said an accredited bander had done them but clearly they hadn't, and they were unable to name them. If there was a documentation process that required all accredited banders producing this and educated about the importance of their certification then those not able to produce proof can be reported and a penalty be utilised.

Conclusion

New Zealand Council of Docked Breeds seeks both appropriate care and welfare standards for all animals including dogs. We however consider that the proposals as set out may have other unintended implications which in and of themselves will not meet the intent or care standards proposed. We suggest that as long standing dog breeders we and our members will be well placed to assist officials and at the very least should not be ignored.

I am happy to answer any questions the Ministry may have with respect to this submission. I am available also to meet should this be helpful.

Thanking you

Anne-Marie Reid

17

From: s 9(2)(a)
Sent: Tuesday, 3 May 2016 1:00 p.m.
To: Animal Welfare Submissions
Subject: Submission

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Please consider the hell to which these creatures are being consigned. Would you want to be in their place ?

Yours sincerely

Becky Turrell

From: Kirstie Stevens s9(2)(a)
Sent: Tuesday, 3 May 2016 12:09 p.m.
To: Animal Welfare Submissions
Subject: STOP Animal Abuse

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Regards,

Kirstie Stevens

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Out of Scope

From: SHIRLEY MEGENS s 9(2)(a)
Sent: Tuesday, 3 May 2016 11:24 a.m.
To: Animal Welfare Submissions
Cc: Lisa Couling
Subject: Fw: "Submission on Animal Welfare Regulations"

Dear Member,

I wish to provide my support to the breeders in the New Zealand community in their bid to remain permitted to "band" tails in selected breed of dogs and also remove the dew claws.

The "type" for a boxer since its inception has always involved the removal of the tail and its dew claws and I can see no reason that this should not be available.

The docking procedure was abolished in Australia and I believe this was quite a brutal approach and now understand why this ceased, however, banding is a passive approach (like sheep which vets consider to be okay) that I support.

Kind regards,

Shirley Megens

s 9(2)(a)

s 9(2)(a)

"Bradshire Boxers"

Email s 9(2)(a)

Please support the right to "tail banning" email : Animal.WelfareSubmissions@mpi.govt.nz

62. Dogs - Tail Docking - current state: Dogs Code of Welfare 2010

Sheep do not lack balance when climbing up and down hills so balance does not come into the equation. Dogs have other means of conveying cues other than those provided by tail motion. Ears, eyes, head carriage etc.

Docked dogs are strong swimmers and agile runners. If the shortening of tails were to effect the dog's ability to swim and run, then the country would currently be overrun with wobbly or drowned dogs. This is an emotive argument that contains no facts It is used solely to introduce emotion into the argument.

Tail injuries represent only a small percentage of why dogs are presented to a veterinary clinic. - most research studies report that the prevalence of tail injuries represents less than 1 percent of all veterinary clinic visits.

Because those dogs whose tails are prone to injury are shortened so vets don't see them.

How will this regulation help? Minimises the level of pain and distress caused.

The tail is shortened in puppies under 4 days of age, who cannot stand, see or hear, and the pain receptors are not fully developed. No pain or distress is caused. Shortening tails is a minor procedure, much easier than the body piercing of thousands of our children.

There is documented evidence from reputable and respected veterinary surgeons that a puppy's nervous system is not fully developed in early days of life. Further, there is evidence to suggest that it is highly probably very young puppies have a comparable absence of sensitivity to pain during the first few days of life. This contrasts with the newborns of many other species (eg: lamb, piglet and human) in which all of these senses are relatively highly developed at birth and is a direct consequence of the somewhat 'immature' state pups are born in.

Veterinarians advocate spaying to prevent possible health problems of female dogs. This is a prophylactic procedure, the same as shortening a dog's tail to prevent potential future injury.

There remains no scientific evidence that docking puppies causes pain or is cruel.

I oppose the introduction to stop the "banning of dogs" tail shortening, and contend that this is NOT in the best interest and welfare of the dogs.

61. Dogs - Dew Claws - Dogs Code of Welfare 2010

Articulated dew claws are firmly attached to the leg. Most front limb dew claw are articulated. The removal often requires the bone to be cut through. This can result in complications including pain, haemorrhage, infection and scarring if not performed correctly.

If performed correctly, there is no bone to cut through, there is no bleeding and only momentarily pain. Most breeders are scrupulously conscious of sterile conditions and there is no chance of infection.

Articulated dew claws may function to prevent foot injury by providing support when running and to keep objects steady while a dog is chewing them.

This statement is from vets who often do not have dogs of their own, and have not witnessed how versatile dogs are.

Many dogs are extremely fast runners and they do not have dew claws to provide support. I personally have not witnessed any foot injury by a dog without dew claws.

Dogs use their front feet to hold objects steady while chewing them. Not dew claws.

Many breeders remove dewclaws on puppies in the first week of life, because soon after birth the dewclaws are more like fingernails than appendages. At that young age, dew claws can be removed relatively easily and no stitches are required.

** They are higher up on his paw so they won't get any wear in the normal course of walking.*

** If they are ever allowed to get long, the quick will grow proportionately, making it more and more difficult to keep that toenail short.*

** Not to mention the fact that dogs with dew claws who also like to dig a lot, will sometimes irritate the dew claw, or even break the dew claw bone (not all dew claws have bones). This could usually happens when reaching through a chain link fence or something similar.*

** If the dew claws on your dog's front or rear paws seem to easily get caught on things, then they could easily rip off — which would be very painful for the dog.*

Lisa Couling

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From: Lisa Couling s9(2)(a)
Sent: Tuesday, 3 May 2016 10:31 a.m.
To: Animal Welfare Submissions
Subject: "Submission on Animal Welfare Regulations"

Follow Up Flag: Follow up
Flag Status: Flagged

"Submission on Animal Welfare Regulations"

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** If the dew claws on your dog's front or rear paws seem to easily get caught on things, then they could easily rip off — which would be very painful for the dog.*

Lisa Couling

From: Matt Hanson § 9(2)(a)
Sent: Monday, 2 May 2016 10:24 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations
Attachments: AnimalWelfareSubmission.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Attached.

Matthew Hanson
§ 9(2)(a)

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Proposal 1:

Electric prodders should be prohibited in all cases, as they cause animals undue pain and distress. Staff ought to use low-stress stock-handling techniques that incorporate an understanding of cattle behaviour.

At the very least, there should be no exception for circus animals (*especially* without the weight restriction), nor a general allowance for cattle over 100kg. There also ought to be no exception for loading the stunning pen, which themselves are cruel.

The infringement fee also ought to be increased and tiered so businesses or managers have an incentive to ensure the welfare of animals, in the same way duty managers and establishments can incur fines for a staff member serving alcohol to a minor.

Proposal 2:

The infringement fee also ought to be increased and tiered so businesses or managers have an incentive to ensure the welfare of animals, in the same way duty managers and establishments can incur fines for a staff member serving alcohol to a minor.

Proposal 3:

The infringement fee also ought to be increased and tiered so businesses or managers have an incentive to ensure the welfare of animals, in the same way duty managers and establishments can incur fines for a staff member serving alcohol to a minor.

Proposal 4:

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Proposal 5:

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Proposal 6:

The infringement fee also ought to be increased and tiered so businesses or managers have an incentive to ensure the welfare of animals, in the same way duty managers and establishments can incur fines for a staff member serving alcohol to a minor.

Proposal 7:

It ought to be included that dogs also have access to clean drinking water.

The infringement fee also ought to be increased and tiered so businesses or managers have an incentive to ensure the welfare of animals, in the same way duty managers and establishments can incur fines for a staff member serving alcohol to a minor.

Proposal 8:

The penalty ought to be a prosecutable regulation offence; similarly with the aforementioned infringement fee changes I have suggested.

Proposal 10:

The prohibition should not be limited to killing a cat or dog by drowning, but include other ways in which an animal might suffer unreasonable or unnecessary pain or distress.

Proposal 11:

Eels ought to be killed before desliming

Proposal 13:

The infringement fee also ought to be increased and tiered so businesses or managers have an incentive to ensure the welfare of animals, in the same way duty managers and establishments can incur fines for a staff member serving alcohol to a minor.

Proposal 14:

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Proposal 15:

The infringement fee also ought to be increased and tiered so businesses or managers have an incentive to ensure the welfare of animals, in the same way duty managers and establishments can incur fines for a staff member serving alcohol to a minor.

Proposal 16:

The infringement fee also ought to be increased and tiered so businesses or managers have an incentive to ensure the welfare of animals, in the same way duty managers and establishments can incur fines for a staff member serving alcohol to a minor.

Proposal 17:

Layer hens ought to be able to express normal behaviours in housing systems *at all reasonable times*. That is, they ought not to be prevented from scratching, ground pecking, and dustbathing between sunrise and sunset, for example.

21:

The infringement fee also ought to be increased and tiered so businesses or managers have an incentive to ensure the welfare of animals, in the same way duty managers and establishments can incur fines for a staff member serving alcohol to a minor.

22:

The infringement fee also ought to be increased and tiered so businesses or managers have an incentive to ensure the welfare of animals, in the same way duty managers and establishments can incur fines for a staff member serving alcohol to a minor.

25:

Minimum lying space for pigs ought to be drastically increased, as there is a high risk of poor welfare outcomes in overstocked areas.

47:

Young calves ought to be fed or slaughtered within 12 hours of their last feed to avoid the unnecessary discomfort of hunger.

51:

Other types of branding, such as the ear-piercing, also ought to be prohibited to eliminate unnecessary suffering of the animal

58:

Freeze branding ought to be prohibited for the same reason as hot branding, even if it is less painful.

64:

Claw removal ought to be allowed only if it is in the best interest of the animal, or for therapeutic reasons.

70:

Tail docking (under 6 months of age) ought only to be done by rubber rings, so as to prevent unnecessary pain and distress.

81:

Tail docking of pigs ought to be prohibited, unless it is for therapeutic reasons.

22

From: Marian Baxter s 9(2)(a)
Sent: Tuesday, 3 May 2016 8:54 a.m.
To: Animal Welfare Submissions
Subject: Local anesthetic and calf disbudding

Follow Up Flag: Follow up
Flag Status: Completed

To Whom it may concern,

We support the amendment to the Animal Welfare Act. We, as a franchised operation, have been using local anesthetic as our preferred method of pain relief to calves when disbudding them, for over 20 years.

Our concerns in relation to the proposals are based on our current experiences when trying to obtain & use the Anesthetic & Spray on Antibiotic. These concerns are:

- Unreasonable certification cost by veterinarians of our technicians to administer the local anesthetic on an annual basis
- Unreasonable cost of local anesthetic & spray on antibiotics (such as tetravet or Aerotet forte) Ranging from \$30 -\$200 for a 500ml packet of Local Anesthetic
- Access to Local anesthetic (some veterinarians simply not certifying our disbudding technicians & thereby not allowing access to the drugs) thereby totally prohibiting our technicians from using our preferred method of operation & forcing them to remove the horns with NO pain relief.

As a group we would like the opportunity to speak on these concerns to those making the amendments to the Act.

Our **nominated** spokesman for the Franchise Group is Kevin Westbury - Franchisor and he can be contacted on s 9(2)(a).

Regards

Marian and Cameron Brensell

Ultra-Scan South Waikato
s 9(2)(a)



(23)

From: Juanita s 9(2)(a)
Sent: Tuesday, 3 May 2016 9:10 a.m.
To: Animal Welfare Submissions
Subject: Submission in animal welfare

Follow Up Flag: Follow up
Flag Status: Completed

Juanita Doherty
s 9(2)(a)

I want to see changes in the Dairy industry I wish to support NZ business's , but not when they have such regulations that include condoning animal cruelty.

Kind regards

Juanita
s 9(2)(a)

Sent from my iPhone

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From: Shannon Grant-Mackie s 9(2)(a)
Sent: Tuesday, 3 May 2016 8:37 a.m.
To: Animal Welfare Submissions
Subject: Animal welfare submission

Follow Up Flag: Follow up
Flag Status: Completed

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Shannon Grant-Mackie

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Georgia Olsen s 9(2)(a)
Sent: Tuesday, 3 May 2016 6:24 a.m.
To: Animal Welfare Submissions
Subject: Timing of Animal Welfare Public Consultaion

Follow Up Flag: Follow up
Flag Status: Completed

To whom it may concern

This is my submission on the regulations released for consultation in April 2016. I do not believe that sufficient time has been allowed to adequately consider the issues raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision- making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Yours truly
Georgia Olsen

Georgia Olsen
s 9(2)(a)

From: stuarthenderson <§ 9(2)(a)>
Sent: Monday, 2 May 2016 6:00 p.m.
To: Animal Welfare Submissions
Subject: ANIMALS, ANIMALS, ANIMALS

Follow Up Flag: Follow up
Flag Status: Completed

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Regards Susan

From: Leah Lynch s 9(2)(a)
Sent: Monday, 2 May 2016 6:06 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Regulations - Review

Follow Up Flag: Follow up
Flag Status: Completed

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Yours sincerely,

Leah Lynch

From: Nikki Adams s 9(2)(a)
Sent: Saturday, 30 April 2016 5:52 p.m.
To: Animal Welfare Submissions
Subject: Re: Submission for the proposed animal welfare changes re number 13: Goats tethering

Further to my previous email re Goats. Goats are social animals and their behaviour needs "opportunity to display normal patterns of behaviour" are never met when they are tethered as they need companionship and are miserable left alone with no stimulation.

Without appropriate shelter they can not keep warm as the layer of fat and their type of coat do not protect them from chills. Ill health, suffering and death often follows when they get wet and are not able to keep dry.

Goats require much more than just grass in their diet. They require salt and hay daily. All ruminates require bulky feed for their digestive systems to work properly.

There are many needs goats have that are not being considered when they are tethered. Not to mention the danger they are left in being vulnerable to attack and abuse. They get caught up or strangled in their chains resulting in distress, infected wounds and too often starvation.

It seems that the recent consultation process regarding their basic needs was a waste of time. It's so disappointing that MPI have ignored the welfare of goats in their proposed bill.

Nikki Adams
Vet nurse
s 9(2)(a)

On 26/04/2016 6:27 PM, "Nikki Adams" s 9(2)(a) wrote:

The proposed standards are better than current laws but still does not go far enough.

Goats welfare are being overlooked far to often even with the proposed changes. "Shelter" needs to be clearly defined due to goats not being able to keep warm without appropriate shelter as unlike sheep have insufficient warmth from their coats once they get wet.

Shelter needs to be large enough for goat to stay dry and needs sides so can shelter from cold winds.

There needs to be law around giving goats more freedom to move naturally without the danger of getting tangled up and needs to be law that goats are checked on more regularly to ensure they are not tangled up preventing them access to their shelter if food/water.

Nikki Adams
Vet nurse
s 9(2)(a)

28

Out of Scope

From: Nikki Adams s 9(2)(a)
Sent: Tuesday, 26 April 2016 2:15 p.m.
To: Animal Welfare Submissions
Subject: Submission on animal welfare regulations re Bobby calves

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Blue Category

The proposal of decreasing the time from 30 to 24 hrs that Bobby calves must have had food before slaughter is not enough. It is inhumane to put these infant animals through the stress of transportation with no food for 24 hours. It brings into question the welfare of these animals if holding and transport times are longer than 8 hours.

Nikki Adams

Vet nurse

Ph s 9(2)(a)

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28

From: Nikki Adams s9(2)(a)
Sent: Tuesday, 26 April 2016 5:39 p.m.
To: Animal Welfare Submissions
Subject: Submission to the animal welfare act propisals/changes re use of electric prodders

Follow Up Flag: Follow up
Flag Status: Flagged

I feel it is unjustified to allow use of electric prodders on animals in a slaughterhouse. I understand the health and safety reasons when dealing with risk to human safety with extra large cows over 100g but think it is causing animals unnecessary mental trauma and other methods of less traumatic control should be used. Sadly i have witnessed a truck driver prodding the stressed cattle in his truck while they were on the picton ferry for no reason other than to bully the animals and I saw the fear in their eyes as he was about to prod them with this cruel method of control.

When it comes to circus animals it is concerning that this needs to even be stipulated as I thought circus animals are banned in New Zealand? But if not then I absolutely think that there should be no use of electric prodders in circus use as these animals have no right to display normal environmental behaviour as it is without further distress placed on them with use of electric prodders.

Nikki Adams

Vet nurse

Ph s9(2)(a)

28

From: Nikki Adams s9(2)(a)
Sent: Tuesday, 26 April 2016 6:01 p.m.
To: Animal Welfare Submissions
Subject: Submission to new animal welfare proposals re Dogs- injuries from collars it tethers and Dogs-Muzzling a dog

Follow Up Flag: Follow up
Flag Status: Flagged

The proposal does not allow for dogs tethered to be able to access drinking water and it should do.
The proposal does not allow for dogs to drink and pant when wearing a nylon muzzle.
The plastic (cage type) muzzles are the only safe muzzles to leave a dog unattended in or to walk a dog in as it allows panting and ability to drink.
There needs to be clear instructions on all nylon muzzle products packerging that it is a punishable offence to use these muzzles for exercising dogs or if leaving unattended for the above reasons

Nikki Adams

Vet nurse

s9(2)(a)

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28

From: Nikki Adams s 9(2)(a)
Sent: Tuesday, 26 April 2016 6:27 p.m.
To: Animal Welfare Submissions
Subject: Submission for the proposed animal welfare changes re 13 Goats tethering

Follow Up Flag: Follow up
Flag Status: Flagged

The proposed standards are better than current laws but still does not go far enough. Goats welfare are being overlooked far to often even with the proposed changes. "Shelter" needs to be clearly defined due to goats not being able to keep warm without appropriate shelter as unlike sheep have insufficient warmth from their coats once they get wet. Shelter needs to be large enough for goat to stay dry and needs sides so can shelter from cold winds. There needs to be law around giving goats more freedom to move naturally without the danger of getting tangled up and needs to be law that goats are checked on more regularly to ensure they are not tangled up preventing them access to their shelter if food/water.

Nikki Adams

Vet nurse

s 9(2)(a)

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28

From: Nikki Adams s 9(2)(a)
Sent: Tuesday, 26 April 2016 8:11 p.m.
To: Animal Welfare Submissions
Subject: Submission for changes to animal welfare regulations -27 pigs farrowing crates and 28 provision of nesting material

Follow Up Flag: Follow up
Flag Status: Flagged

There needs to be stricter enforceable laws on pigs in farrowing crates. They should have regular daily breaks from the crates (there is no mention of this in the regulations) and access to daylight. There needs to be more specific rules around ensuring appropriate nesting material is provided so that the sows can express natural behaviors. "Malleable" materials the sow can chew at ground level should be in the wording of the minimum standard to ensure their ability to display naturally behaviour and their strong nesting instincts.

Nikki Adams

Vet nurse

s 9(2)(a)

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From: Sean O'Connor s9(2)(a)
Sent: Saturday, 30 April 2016 6:59 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Consultation

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider, and discuss with colleagues and peers, the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Yours sincerely

*Angela Seaton
B Agr Sci, M Agr Sci*

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From: Jean Allan § 9(2)(a)
Sent: Monday, 2 May 2016 6:07 p.m.
To: Animal Welfare Submissions
Subject: Stop animal abuse

Follow Up Flag: Follow up
Flag Status: Completed

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Regards,
Jean
Sent from my iPhone

From: melissa Wood s 9(2)(a)
Sent: Monday, 2 May 2016 9:40 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare submissions

Follow Up Flag: Follow up
Flag Status: Completed

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016.

You can extend the consultation. You can push your timelines out. It may take some statutory wangling, and be annoying for your processes but its not impossible and you know it you may just not want to do it is all. Working in local government consultations for many years I have some idea of how it works. Please do so to allow people time to adequately consider & respond, as requested. And to give credibility to your guidelines.

I myself am seriously appalled at the woeful attempt to address animal welfare issues. Who has created these proposals? Some out of touch old boys club baldheads sitting in an office just wanting to tick this requirement off their list? Please get real, we cannot in the name of humanity go on making animal abuse ok. Take a good look and actually get in touch with what is happening. Yes you may have to rewrite a lot of this but that's how it works and sorry if its going to require extra resource but this is really important.

Please extend the consultation period.

*Thank you
Melissa Wood*

From: Amalie Niland § 9(2)(a)
Sent: Monday, 2 May 2016 10:07 p.m.
To: Animal Welfare Submissions
Subject: Regulations Consultation April 2016

Follow Up Flag: Follow up
Flag Status: Completed

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Regards
Amalie Niland

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Melisa Quinn <^s
Sent: Monday, 2 May 2016 3:04 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Submissions

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith. I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

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I request that you start the decision- making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

*Thanks
Melisa*

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34

From: Sophie Sills § 9(2)(a)
Sent: Monday, 2 May 2016 2:33 p.m.
To: Animal Welfare Submissions
Subject: Consultation time frame

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Regards,
Sophie Sills

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2nd May 2016

Mrs Barbara Stronach

s 9(2)(a)

35



Animal Welfare Policy Ministry for Primary Industries
PO Box 2526
Wellington 6140

animal.welfaresubmissions@mpi.govt.nz

Re: Animal Welfare Regulations Submission

Introduction

The purpose of this submission is to comment on proposed Animal Welfare Regulations. The Ministry for Primary Industries (MPI) seeks feedback on proposed regulations intended to improve the current animal welfare system.

This submission is made by Barbara Stronach in support of submissions and representations made by the New Zealand Council of Docked Breeds (NZCDB)

The contact person for this submission is:

Name: Barbara Stronach

Address: s 9(2)(a)

Contact Phone: s 9(2)(a)

Email: s 9(2)(a)

62. Tail Docking

This is the 3rd time as a dedicated Pembroke Welsh Corgi Breeder that I have had to prepare and submit submissions on Tail Docking and Dew Claw removal. I have kept all these records along with information for the UK, and Germany on the subject.

I have been breeding and showing Pembroke Welsh Corgis for more than 30 years and over this time I have never encountered your issues that you refer to in **What is the Problem:**

You argue that dogs' tails have a function in terms of balance and a means of communication with other dogs and humans and that research has shown that a longer tail is more effective at conveying different cues such as those provided by tail motion.

Response

Sheep do not lack balance when climbing up and down hills so balance does not come into the equation. Dogs have other means of conveying cues other than those provided by tail motion. Ears, eyes, head carriage etc.

Docked dogs are strong swimmers and agile runners. If the shortening of tails were to effect the dog's ability to swim and run, then the country would currently be overrun with wobbly or drowned dogs. This is an emotive argument that contains no facts. It is used solely to introduce emotion into the argument.

You argue that the primary reasons that dogs' tails are docked are for aesthetic (breed standards), convenience and to prevent injury.

Response

NZ vets do not get to see many tail injuries in this country; that is because these dogs are **docked**; so it would be fair to say that the NZ study replied on has no basis. The UK systems has again now allowed Gun Dogs and Working breeds to be docked again due to injuries and the pain of these.

Dockings is carried out by Dedicated Breeders who have the upmost dedications to the docked breeds and carry out this very quick procedure before the puppies reach 4 days of age. At this point in their lives the puppies cannot stand, see or hear, and the pain receptors are not fully developed. No pain or distress is caused. Shortening tails is a very minor procedure. The same with removal of the Dew Claws which cause horrendous problems if left on and Pet Owners fail to keep these clipped short.

There is documented evidence from reputable and respected veterinary surgeons that a puppy's nervous system is not fully developed in early days of life. I have many articles and one in particular written by Prof. Dr R Fritsch who wrote an article on this subject for the German Kennel Club provides support that there is no evidence to suggest sensitivity or pain during the first few days of life. This contrasts with the newborns of many other species (eg: lamb, calves, piglet and human) in which all of these senses are relatively highly developed at birth and is a direct consequence of the somewhat 'immature' state pups are born in.

Veterinarians advocate spaying to prevent possible health problems of female dogs. This is a prophylactic procedure, the same as shortening a dog's tail to prevent potential future injury.

Internationally tail docking is either banned or restricted in various countries.

Response

Yes this may be the case. It crept into Australia through Western Australia before any of the Dog Breeders / Owners knew it was being brought before their Animal Welfare Council and had no chance to object or have their say. This is not what is known as democracy and had they had the chance they would have fought to retain what we have here in New Zealand.

How will regulations help?

Response

We already have excellent regulations in place which govern the docking of dogs. The New Zealand Council of Docked Breeds (NZCDB) have strict guide lines which must be followed, along with a recording system that must be adhered to and the registration of Pedigree Puppies by the New Zealand Kennel Club checks thoroughly these records. No docking of Un Registered Pedigree Dogs is permitted and no responsible registered Docked Breeder would every perform docking on these dogs

Your argument is that articulated dew claws are firmly attached to the leg. Most front limb dew claw are articulated. The removal often requires the bone to be cut through. This can result in complications including pain, haemorrhage, infection and scarring if not performed correctly.

Response

If performed correctly, there is no bone to cut through, there is no bleeding and only momentarily pain. Most breeders are scrupulously conscious of sterile conditions and there is no chance of infection.

Articulated dew claws may function to prevent foot injury by providing support when running and to keep objects steady while a dog is chewing them.

Response

This statement is from vets who often do not have dogs of their own, and have not witnessed how versatile dogs are. Many dogs are extremely fast runners and they do not have dew claws to provide support. I personally have not witnessed any foot injury by a dog without dew claws. Dogs use their front feet to hold objects steady while chewing them. Not dew claws. Many breeders remove dewclaws on puppies in the first week of life, because soon after birth the dew claws are more like fingernails than appendages. At that young age, dew claws can be removed relatively easily and no stitches are required.

- *They are higher up on his paw so they won't get any wear in the normal course of walking.*
- *If they are ever allowed to get long, the quick will grow proportionately, making it more and more difficult to keep that toenail short. This is quite factual with many Pet Owners who don't keep these trimmed and they start to grow back around into the dogs leg.*
- *Not to mention the fact that dogs with dew claws who also like to dig a lot, will sometimes irritate the dew claw, or even break the dew claw bone (not all dew claws have bones). This could happen when reaching through a chain link fence or something similar.*
- *If the dew claws on your dog's front or rear paws seem to easily get caught on things, then they could easily rip off — which would be very painful for the dog.*

Conclusion

1. I along with other members of the NZCDB seek and maintain appropriate care and welfare standards for all animals including dogs. I however consider that the proposals as set out may have other unintended implications which do not meet the intent or care standards proposed. I would suggest that as long standing Pedigree dog breeders that I and the other members are well placed to assist officials and at the very least this should not be ignored.
2. I welcome any questions the Ministry may have with respect to this submission and along with the NZCBD am available also to meet should this be helpful.

Kind Regards



Barbara Stronach
Fairstorm Pembroke Welsh Corgis

From: John Grant-Mackie s 9(2)(a)
Sent: Monday, 2 May 2016 12:23 p.m.
To: Animal Welfare Submissions

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

--

-John A. Grant-Mackie

37

From: Ashley s 9(2)(a)
Sent: Monday, 2 May 2016 12:35 p.m.
To: Animal Welfare Submissions
Subject: Submission

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Regards,
Ashley Stewart

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Nichola Kriek § 9(2)(a)
Sent: Monday, 2 May 2016 10:10 a.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

58

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Best wishes

Nichola Kriek

From: s 9(2)(a)
Sent: Monday, 2 May 2016 9:33 a.m.
To: Animal Welfare Submissions
Subject: review animal welfare regs

Follow Up Flag: Follow up
Flag Status: Flagged

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

The issue of animal welfare is not going to go away.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

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In addition I believe that the role of MPI as abitrator of animal welfare standards is a conflicting one and an independent body should be established. MPI have always put profit before animal welfare and pay lip service only to overseeing animal welfare standards.

Terri Newton

From: laura.gentle@9(3)(a)
Sent: Monday, 2 May 2016 9:18 a.m.
To: Animal Welfare Submissions
Subject: Animal welfare submissions

Follow Up Flag: Follow up
Flag Status: Flagged

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Laura Gentle

From: Alice Fairley s 9(2)(a)
Sent: Monday, 2 May 2016 9:10 a.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Submission

Follow Up Flag: Follow up
Flag Status: Completed

To the Ministry of Primary Industries,

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This is not about me, or you; it's about the countless animals whose lives depend on the way we decide to treat them. Please do the right thing and allow more time for discussion. We have the power to make these decisions, so we should at least try to make the right ones. Please don't put profit ahead of life.

Thank you,
Alice Fairley

From: Rosie Smyth s 9(2)(a)
Sent: Monday, 2 May 2016 9:08 a.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Policy

Follow Up Flag: Follow up
Flag Status: Completed

To the Ministry of Primary Industries,

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I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

*Yours Faithfully
Rosemary Smyth*

43

Out of Scope

From: Catherine Robinson § 9(2)(a)
Sent: Monday, 16 May 2016 6:35 a.m.
To: Animal Welfare Submissions
Subject: Welfare Submissions

To the Ministry of Primary Industries,
This is my submission on the regulations released for consultation in April 2016.

I would like you to conduct a full and thorough review of factory farming as a whole, including all the animals trapped indoors in permanent confinement. We should not be regulating practices that breach NZ's own Animal Welfare Act, we should be looking into the future and creating a plan to ban them.

Please remove the regulations you have created regarding factory farmed animals, such as the ones that relate to farrowing crates and colony cages. Then set a date to review these and all other factory farming practices.

Factory farming is an abhorrent practice, and New Zealand needs a long term strategy for phasing it out. A factory farming review will send a message to industry to guide future investment, as well as give an opportunity to address the largest animal welfare issue facing New Zealand.

I also ask that you consider the evidence that rodeos are cruel, and ban them. The animals will not perform if not distressed by a variety of means, such as the flank strap.

Finally, I would like to you to ban the use of exotic animals in circuses. There is ample evidence that these animals suffer in captivity, and there is no reason to allow that suffering for entertainment purposes.

Sincerely
Catherine Robinson

—
Catherine Robinson
Accounts Payable
§ 9(2)(a)



§ 9(2)(a)

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From: Catherine Robinson s 9(2)(a)
Sent: Monday, 2 May 2016 7:04 a.m.
To: Animal Welfare Submissions
Subject: Submissions....

To the Ministry of Primary Industries,

I am writing to express my concern over the lack of time the New Zealand Public are given to put forward their submissions regarding the changes to Animal Welfare.

To be able to read through over 100 pages of documentation and research information needs a great deal more time than 5 weeks. You want us to have our say then a more reasonable amount of time is essential. I work full time, a long with other people I know who are keen to review the proposed regulations. Allowing this will show that you do genuinely care what the New Zealand public has to say.

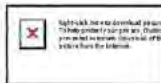
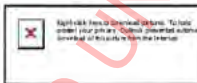
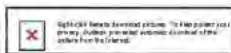
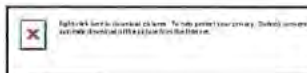
Yours sincerely
Catherine Robinson

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Catherine Robinson
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From: Catherine Robinson s 9(2)(a)
Sent: Thursday, 19 May 2016 6:15 a.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare

MPI Animal Welfare Codes Submission

Nathan Guy Minister for Primary Industries

In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and I ask that a more realistic time frame be given for the public to have our say.

I suggest a period of five weeks be given to each section of the proposed welfare regulations.

While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, I ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare. I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

- 1) From 5.3m dairy cows in 2007 to 6.4m in 2012 (23% increase in just 5 years) Statistics NZ
- 2) Switzerland banned cages for hens in 1992

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on:</p> <ol style="list-style-type: none"> a. the species and size of an animal b. the manner of use of an animal (circus) c. the location of the animal (slaughter premises) <p>I support the proposed infringement penalty.</p>
2	All animals	Use of goads
		<p>I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.</p>
3	All animals	Twisting an animal's tail
		<p>I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.</p>

Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading¹, only one individual was prosecuted in relation to the footage², presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) http://safe.org.nz/nz-dairy-industry-exposed 2) https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</p>
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China

		The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across Cook Strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed
		I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to <4 degrees Celsius renders crustacean insensible and propose that either: a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to <4 degrees Celsius renders crustacean insensible. I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.
13	Goats	Tethering requirements
		I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ. I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500. I also propose that as goats are social animals, all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300. 1. Miranda-de la Lama, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10
14	Horses	Use of a whip, lead, or any other object
		I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.
15	Horses	Injuries from equipment such as halter, head ropes and saddles
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.

16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met'. 1) Sections 9, 68 Animal Welfare Act 1999
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully'. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens'. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes') if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> • Sufficient length of perching space to allow all birds to perch at the same time; and • Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night. <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. 'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'.</p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens'. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage</p> <p>2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57.</p> <p>3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.</p> <p>4) Cooper, J.J. and Ablentosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>

20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		Proposal: I support the proposal that all pigs have access to a dry sleeping area. Penalty: I support the proposed infringement penalty of \$300.
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believe the formula intended by MPI should read "live weight^{0.67} (kg)" but instead it reads "live weight 0.67(kg)" which translates to an Area = 0.03 * liveweight * 0.67(kg) and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. (2006) which ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI². A k-value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen, not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage" ⁴. If these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. I would like the regulations to be</p>

		<p>clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m²) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m²) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>1) Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spolder, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>2) Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&context=kaesrr</p> <p>3) ibid. Page 9</p> <p>4) "ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 <https://www.mpi.govt.nz/document-vault/1446></p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC¹. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates^{2,3}.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>1) "National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</p> <p>2) Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</p> <p>3) KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. http://www.sciencedirect.com/science/article/pii/S0167587711003564</p>
28	Pigs	Provision of nesting material
		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for</p>

		<p>clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust¹</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p> <p>1) Chaloupková, H. "The effect of nesting material on the nest-building and maternal ... - NCBI." 2011. http://www.ncbi.nlm.nih.gov/pubmed/20889685</p>
29	Rodeos	Fireworks
		<p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010) And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 62,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses
		<p>I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.</p>
31	Cattle	Milk stimulation
		<p>I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.</p>
32	Cattle and Sheep	Vehicular traction in calving or lambing
		<p>I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.</p>
33	Cattle and Sheep	Ingrown horns
		<p>I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.</p>
34	Stock transport	Cuts and abrasions
		<p>I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.</p>
35	Stock transport	Animals with ingrown horns

		I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities

		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading¹, only one individual was prosecuted in relation to the footage², presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) http://safe.org.nz/nz-dairy-industry-exposed 2) https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		<p>I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading¹. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p>1) http://safe.org.nz/nz-dairy-industry-exposed</p>
Proposed	Young Calves	Same day slaughter
		I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves¹. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.

45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper does not demonstrate that:</p> <ul style="list-style-type: none"> a) this is in fact the case in calves <5 days of age or b) that these calves are not experiencing significant hunger or c) that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study. <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>2) Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves we propose an increase in the infringement penalty to \$1000.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.
50	Young Calves	Transport by sea across Cook Strait prohibited
		I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.

Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I propose that all cats and dogs sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding

		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. Pain relief must be used at the time of this procedure.
63	Cattle	Teats
		I support the proposal for supernumerary teat removal of animals >6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals <6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that: a) the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age i) infringement penalty of prosecution b) pain relief is required for any supernumerary teat removal procedure regardless of age ii) infringement penalty of prosecution c) procedure is performed using sterilised equipment iii) infringement penalty of \$500 d) any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian iv) infringement penalty of prosecution
64	Cattle	Claw removal
		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.

65	Cattle	Teat occlusion
		I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking
		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking
		I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking.

		<p>Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months.</p> <p>I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male.</p> <p>I support the proposed penalty of prosecution for infringements in sheep > 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use.</p> <p>I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep < 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep <2 months of age and a penalty of \$300 for lack of NSAID use.</p>
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses
		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		<p>I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty.</p> <p>I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.</p>
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.
79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the

		time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.
80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.

Thank you for reading and taking these important animal welfare regulations into your consideration.

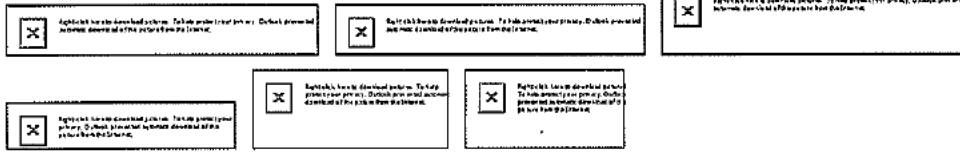
Yours sincerely
Catherine Robinson

--
Catherine Robinson
Accounts Payable
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RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Jennifer Gilbert-Potts Gilbert-Potts § 9(2)(a)
Sent: Sunday, 1 May 2016 10:07 p.m.
To: Animal Welfare Submissions
Subject: Submission



To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Animal cruelty enshrined in law by stealth - unacceptable. We need more time.

Regards,

Jennifer Gilbert-Potts

§ 9(2)(a)

From: Taylor Pascoe s9(2)(a)
Sent: Sunday, 1 May 2016 8:36 p.m.
To: Animal Welfare Submissions
Subject: Bring in stronger laws for animals

1582

I read through the animal rights laws in New Zealand and honestly I think they are a joke and I think the way you handle things makes our animal welfare laws look like a joke. New Zealand is meant to pride itself on animal welfare yet the people who are meant to be enforcing it have to have it publicly shown and be shamed for doing nothing to pretend they are doing something.

The fact that you do not believe prostituting battery farmers that torturing innocent birds because 'it's not in the best interest of the birds' is ridiculous. Prosecute them, they are doing something illegal. Make battery farming illegal. Tell farmers they have to raise their bobby calves if they want to be dairy farmers. Stop with the pretending that killing millions of bobby calves every year is not cruel, and stop pretending that not prosecuting these people is in the best interest of the animals. These animals shouldn't even be locked in cages. If New Zealanders want to farm they should do it ethically and right. Which is every animal gets space where they can run around OUTDOORS and when I say space I don't mean 5cm each side of them I mean proper space like a good 10 meters of space. Space that you would want if you were an animal.

Stand up for these animals otherwise you really are just making yourself look like a joke. Already you have ignored bobby calves being beaten to death, and right now you are ignoring chickens being tortured in cages. People shouldn't even have to email you that the laws are wrong, you should already know. It's common sense, if you wouldn't like to be beaten to death, have no space to move and live everyday in a shed then why would any living creature want to? and on top of anyone breaking any of your weak laws should be prosecuted at least 10 years. It's not hard to stay within the line of laws that promote cruelty. You have to seriously go out of your way to break laws that are in place already so they should have a heavy prosecution seeing you have to pretty much physically torture the animals to break those laws.

Thank you for reading. I hope you make the right choice. I am sure deep down you know what it is, and I am sure you already know that the laws in place do not meet the standards they should.

From: K King s 9(2)(a)
Sent: Sunday, 1 May 2016 12:22 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Regulations

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision-making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, hobby calves, animals in rodeo, and live exports in five weeks.

*Sincerely
Kayla Alexander*

From: Thea Lyle § 9(2)(a)
Sent: Sunday, 1 May 2016 1:18 p.m.
To: Animal Welfare Submissions
Subject: MPI-Animal Welfare time to change

47

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision- making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

*Regards,
Thea Lyle*

Sent from my iPhone

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Warwick Lissaman s 9(2)(a)
Sent: Sunday, 1 May 2016 1:51 p.m.
To: Animal Welfare Submissions
Subject: 'Submission on Animal Welfare Regulations'

submitter: Warwick Lissaman

s 9(2)(a)

s 9(2)(a)

Dear Sir/Madam

the Proposed animal welfare regulations are yet to address the animal health risk from pest plants. specifically Chilean Needle Grass, a bio-security pest plant of national importance, which can be categorised as a pelt/soft tissue penetrating pest plant, causing significant distress to grazing animals with a potential to cause blindness and death from misadventure, and significant down grading of carcass value, and subsequent farm / associated processing industry financial viability.

Mandatory farm mapping of infestations and development of property specific farm management plans are required for animal health/welfare reasons.

Grazing rotations, shearing of sheep, animal species specific risk factors (which are not well understood and without research rules would be very prescriptive and therefore requiring of enabling legislation to support research).

Tracking of animal movements required to address animal welfare risk factors.

Appropriate animal transport rules are required to prevent spread and ensure pest free areas are maintained. farm specific management plans must also address the bio-security spread risk assessment and management of.

ends.

From: Mindy Pilbrow s 9(2)(a)
Sent: Sunday, 1 May 2016 2:04 p.m.
To: Animal Welfare Submissions
Subject: Request regarding consultation

49
1982

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Thanks and kind regards
Melinda

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Lucy GOLDSBRO § 9(2)(a)
Sent: Sunday, 1 May 2016 2:10 p.m.
To: Animal Welfare Submissions
Subject: animal welfare

(50)

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Danielle Duffield <danielle.duffield@nzala.org>
Sent: Sunday, 1 May 2016 2:45 p.m.
To: Animal Welfare Policy
Subject: Request for extension - submission on proposed animal welfare regulations

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom it May Concern,

I am the president of the New Zealand Animal Law Association (NZALA; www.nzala.org). We are a registered charity comprised of lawyers working to improve animal law and advance animal law education in New Zealand. NZALA wishes to file a comprehensive submission on the proposed animal welfare regulations.

However, we note that the five-week timeframe given to provide feedback is very short relative to the number of regulations that are being consulted on. This timeframe is particularly challenging for our organisation, as we are entirely volunteer-based. This means that all lawyers assisting with our submission are completing this work in their spare time, outside of work hours.

I am therefore writing to request a one-month extension for our submission, until **20 June 2016**. This will ensure that we have adequate time to make a comprehensive submission on these important regulations.

Could you please advise if this extension will be granted?

Kind regards,

Danielle Duffield

President, New Zealand Animal Law Association

From: Danielle Duffield <danielle.duffield@nzala.org>
Sent: Sunday, 1 May 2016 2:36 p.m.
To: Animal Welfare Submissions
Subject: Request for extension - submission on proposed animal welfare regulations

To Whom it May Concern,

I am the president of the New Zealand Animal Law Association (NZALA; www.nzala.org). We are a registered charity comprised of lawyers working to improve animal law and advance animal law education in New Zealand. NZALA wishes to file a comprehensive submission on the proposed animal welfare regulations.

However, we note that the five-week timeframe given to provide feedback is very short relative to the number of regulations that are being consulted on. This timeframe is particularly challenging for our organisation, as we are entirely volunteer-based. This means that all lawyers assisting with our submission are completing this work in their spare time, outside of work hours.

I am therefore writing to request a one-month extension for our submission, until **20 June 2016**. This will ensure that we have adequate time to make a comprehensive submission on these important regulations.

Could you please advise if this extension will be granted?

Kind regards,

Danielle Duffield

President, New Zealand Animal Law Association

From: Brian § 9(2)(a)
Sent: Sunday, 1 May 2016 2:58 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

1/05/2016

Brian Brogan

§ 9(2)(a)

Re: Animal Welfare Regulations Submission

Introduction

1. The purpose of this submission is to comment on proposed Animal Welfare Regulations. The Ministry for Primary Industries (**MPI**) seeks feedback on proposed regulations intended to improve the current animal welfare system.

2. This submission is made by Brian Brogan

The following organisation support this submission

New Zealand Council of Docked Breeds (**NZCDB**)

3. The contact person for this submission is:

Name: Brian Brogan

Address: § 9(2)(a)

Contact Phone: § 9(2)(a)

Email: § 9(2)(a)

General Comments

4.

a. I have owned and bred dogs for over 47 years. 35 years associated with Rottweilers and tail docking.

b. My issues with the animal welfare regulations I wish to raise and in general terms why I wish to raise them concerning specifically the Dogs Code of Welfare 2010. 61. Dogs - Dew Claws and the Dogs Code of Welfare 2010. 62. Dogs - Tail Docking.

5. 62. Dogs - Tail Docking - current state: Dogs Code of Welfare 2010

6. Dogs' tails have a function in terms of balance and a means of communication with other dogs and humans. Research has shown that a longer tail is more effective at conveying different cues such as those provided by tail motion.

7. *Answer - Sheep do not lack balance when climbing up and down hills so balance does not come into the equation. Dogs have other means of conveying cues other than those provided by tail motion. Ears, eyes, head carriage etc.*

8. *Docked dogs are strong swimmers and agile runners. If the shortening of tails were to effect the dog's ability to swim and run, then the country would currently be overrun with wobbly or drowned dogs. This is an emotive argument that contains no facts. It is used solely to introduce emotion into the argument.*

9. Tail injuries represent only a small percentage of why dogs are presented to a veterinary clinic. - most research studies report that the prevalence of tail injuries represents less than 1 percent of all veterinary clinic visits.

10. *Answer - Because those dogs whose tails are prone to injury are shortened so vets don't see them.*

11. How will this regulation help? Minimises the level of pain and distress caused.

12. *Answer - The tail is shortened in puppies under 4 days of age, who cannot stand, see or hear, and the pain receptors are not fully developed. No pain or distress is caused. Shortening tails is a minor procedure, much easier than the body piercing of thousands of our children.*

13. *There is documented evidence from reputable and respected veterinary surgeons that a puppy's nervous system is not fully developed in early days of life. Further, there is evidence to suggest that it is highly probable very young puppies have a comparable absence of sensitivity to pain during the first few days of life. This contrasts with the newborns of many other species (eg: lamb, piglet and human) in which all of these senses are relatively highly developed at birth and is a direct consequence of the somewhat 'immature' state pups are born in.*

14. *Veterinarians advocate spaying to prevent possible health problems of female dogs. This is a prophylactic procedure, the same as shortening a dog's tail to prevent potential future injury.*

Conclusion

I oppose the introduction of the banning of dogs' tail shortening, and contend that this is NOT in the best interest and welfare of the dogs.

15. Our breeding kennels seeks both appropriate care and welfare standards for all animals, including dogs. We however consider that the proposals as set out may have other unintended implications which in and of themselves will not meet the intent or care standards proposed. We suggest that as long standing dog breeders should not be ignored.

16. We welcome any questions the Ministry may have with respect to this submission. We are available also to meet should this be helpful.

There remains no scientific evidence that docking puppies causes pain or is cruel. I oppose the introduction of the banning of dogs' tail shortening, and contend that this is NOT in the best interest and welfare of the dogs.

Respectfully

Brian Brogan

s 9(2)(a)

53

From: Lisa H § 9(2)(a)
Sent: Sunday, 1 May 2016 6:27 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Kind regards,

Lisa Hart

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Yolanda Soryl s 9(2)(a)
Sent: Sunday, 1 May 2016 8:18 p.m.
To: Animal Welfare Submissions
Subject: submission on the regulations released for consultation in April 2016

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Yours sincerely,

Yolanda Soryl

Yolanda Soryl

s 9(2)(a)



RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Briar Tiffen s9(2)(a)
Sent: Saturday, 30 April 2016 4:07 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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These are serious issues and many people want to have their say on them, so allow them to.

Regards,
Briar Tiffen.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Lyndsay § 9(2)(a)
Sent: Saturday, 30 April 2016 4:08 p.m.
To: Animal Welfare Submissions
Subject: Submission

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Regards

Lyndsay Veganforlife

Lyndsay Vegante for life

150

From: Lyndsay §9(2)(a)
Sent: Sunday, 15 May 2016 9:09 p.m.
To: Animal Welfare Submissions
Subject: AW Regulations submission

See also

56

To MPI

Re Proposal 48. Young calves-Duration of transport + Lack of regulations around transportation for all livestock

Room to display normal behaviour and space to lie down simultaneously

Time restrictions for transport of all animals (8 hours or nearest abattoir)

Young calves/Bobby calves MUST be transported to the nearest possible abattoir

The physiological detriment during transport, has been well documented in most farmed animals (Rutter and Randall, 1993). Travel-sick behaviour, including foaming at the mouth and teeth grinding, are often noted during transportation (Bradshaw, Hall et al., 1996), and one study determined that 33% of pigs vomited over a period of 1.5 hours in transit (Bradshaw, Parrott et al., 1996). It should be noted that this data may be under-representative, as many pigs will swallow vomit soon after cessation of movement (Bradshaw, Hall et al., 1996). To support this data, Forsling et al., (1984) showed that the experience of vibration and impact during travel caused elevated levels of plasma lysine vasopressin (LVP), a hormone associated with nausea and vomiting.

Stocking density is an underlying factor for many welfare concerns including the mitigation of extreme temperatures, social aggression and adequate room to display normal behaviour (Randall, 1993). Many authors have noted the occurrence of rectal prolapse when pigs are transported at high density; a condition highly indicative of extreme stress (Guise and Penny, 1989). Unfortunately there is little data available to correlate physiological responses to stocking density. However in the absence of such data, it should be assumed that there is a welfare cost involved, and animals should be allowed enough space to lie down simultaneously (Warriss, 1998).

Regulations should be put in place for maximum time travel – 8 hours, or to the nearest abattoir (should this be further than 8 hours).

Bobby calves MUST be transported to the nearest possible abattoir. This is paramount as welfare is a huge concern with such young animals that often receive inadequate colostrum and prolonged period since last feed (even 24 hours, as stated in the new proposal, is long enough to result in dehydration and lethargy).

Bradshaw, R.H., and Hall, S.J.G. (1996). Incidence of travel sickness in pigs. Veterinary Record, 139, 503

Bradshaw, R.H., Parrott, R.F., Goode, J.A., Lloyd, D.M., Rodwar, R., and Broom, D.M. (1996). Behavioural and hormonal responses of pigs during transport: Effect of mixing and duration of journey. Animal Science 62, 547-554.

Forsling, M.L., Sharman, D.F., and Stephens, D.B. (1984). Vasopressin in the blood plasma of pigs and calves exposed to noise and vibration comparable with that experienced during transport. *Journal of Physiology* 357, 1057-1060.

Randall, J.M. (1993). Environmental parameters necessary to define comfort for pigs, cattle and sheep in livestock transporters. *Animal Production*, 57, 299-307.

Guise, H.J., and Penny, R.H. (1989). Factors influencing the welfare and carcass and meat quality of pigs 1. The effects of stocking density in transport and the use of electric goads. *Animal Production* 49, 511-515.

Warriss, P.D. (1998). The welfare of slaughter pigs during transport. *Animal Welfare* 7, 365-381.

Grandin, T. (1997). Assessment of stress during handling and transport. *Journal of Animal Science*, 75, 249-257.

Re Proposal 29. Rodeos

Rodeos must be prohibited

Calf roping: 3-month old calves are chased at high speed, roped around the neck and thrown to the ground by a cowboy who ties its legs together. This can cause spinal damage, broken bones and internal haemorrhaging. These injuries can be fatal. The calf endures physical abuse and psychological stress.

Bucking: Animals buck because they are forced to wear a flank strap, which is tied tightly around their hindquarters, causing pain. The experience is painful, stressful, and terrifying.

Steer wrestling: A steer is chased in a rodeo arena, grabbed by the horns and twisted to the ground by a cowboy. This is an unnatural angle to twist their neck and can result in injury including a broken neck, broken horns and spinal injuries. Not to mention psychological stress.

While the literature in New Zealand rodeos is limited, it is undeniable that these animals endure physical abuse and psychological stress in the name of entertainment. Overseas research of the same cruel practices shows heightened cortisol (stress), and enzyme CK (muscle damage and trauma) due to this abhorrent "sport".

This cruel "sport" has already been banned in the UK, the Netherlands and parts of Australia, the United States and Canada. It is unacceptable that NZ still permits it.

To ban the use of fireworks is NOT good enough.

Corey, D. (2011). *Welfare issues in the rodeo horse*. Oxford, UK: Wiley-Blackwell.

Re Proposal 13. Goats-Teething requirements

Prohibit the permanent tethering of goats

MPI has stated that 50 complaints a year are made, relating to tethered goats. It is acknowledge that this is an area of frequent reoffending, and that current responses appear ineffective at deterring frequent reoffending.

The road-side, tethered goat is entirely restricted to seek out its own food, water and shelter, and even if these necessities are provided, the nature of tethering is such that the goat may tangle itself easily. As this is common practice in country farmland, any problems may go unnoticed for extended periods of time.

The practice of tethering a goat to the roadside is completely unnecessary, has no claim to a profit or benefit of any kind, and is heavily unjustified. The risks far outweigh any justification.

Furthermore, goats are highly social animals and are found in herds, the basic social unit being adult females and their recent offspring. Even males will form associations with other males or larger mixed-aged groups. Goats naturally range up to 13km a day, all the while in the company of other goats. This gives further reason to find the tethering of a single goat, alone on the road side, cruel and unjust.

I would strongly support a proposal to prohibit the tethering of goats, altogether.

Re Proposal 27. Pigs-size of farrowing crates

Progression of farrowing crates to farrowing pens

Evidence suggests that sows in such confinement have weaker heart muscle and an increase in structural bone damage (Marchant et al., 1997), significantly higher levels of cortisol increasing with time spent in the crate ((Jarvis et al., 2001), and reduced milk production and growth rate (Brumm, 1996).

Welfare issues can be mitigated by allowing the sow a large enough area that she may turn around, a defecation area separate to the nesting area, and provision of nesting material (Weaver and Morris, 2004). I applaud you in already proposing a requirement of the latter.

I fully understand the benefits of farrowing crates (reduction of piglet mortality, separate piglet warming area, convenience etc), however this justification is now outdated as other options exist. I urge you to set a phase-out date for farrowing-crates, with compulsory progression to farrowing pens, which is larger than a crate, allowing more natural behaviours and mitigating the physical repercussions outlined above, while still offering protection for the piglets. These pens are already installed at Waikato's Warratah Farms, where Kirsty Chidgey carried out her research (The welfare, behaviour and productivity of sows and piglets in farrowing crates and farrowing pens).

Marchant, J.N., Rudd, A.R., and Broom, D.M. The effects of housing on heart rate of gestating sows during specific behaviours. Applied Animal Behaviour Science 55, 67-78.

Brumm, M.C. (1996). Effect of space allowance on performance to 136 kilograms body weight. Journal of Animal Science 74, 745-749.

Jarvis, S., Van der Vegt, B.J., Lawrence, A.B., McLean, K.A., Deans, L.A., Chirnside, J., and Calvert, S.K. (2001). The effect of parity and environmental restriction on behavioural and physiological responses of pre-parturient pigs. Applied Animal Behaviour Science 71, 203-216.

Weaver, S.A., and Morris, M.C. (2004). *Science, pigs, and politics: a New Zealand perspective on the phase-out of sow stalls*. *Journal of Agricultural and Environmental Ethics* 17: 51-66.

Re Proposal 67. Cattle and sheep- Castration and shortening of the scrotum

Proposal 70. Sheep-Tail docking

Administer long-acting pain relief at the time of the procedure

Prohibit the use of rings in lambs and cattle over 6 weeks old

Studies have shown that out of the 3 methods of castration and docking (ring, surgical, or hot iron), ring castration elicits the most profound, chronic (longest-lasting) pain. So while applying a rubber ring is aesthetically pleasing and convenient for the farmer, the suffering is immense. We therefore have a moral obligation to mitigate this suffering, and approach this practice as meeting the criteria for a *significant surgical procedure*. It should be a requirement that a long-acting analgesic (such as NSAIDs) be administered at the time of the procedure.

Furthermore, at 6 months old the nervous system is well developed and the cut-off age for this practice should be much lower. The average age of tail docking and castration of lambs in NZ is at 3-6 weeks old anyway, and therefore would not be a large inconvenience anyway.

In cattle, not only is the nervous system well developed at this age, but the sheer size of the testicles means incomplete vascular occlusion is common, resulting in complications and a huge welfare concern. As a result of this practice, it is not uncommon in the veterinary profession to see steers with testicles swollen to the size of a football. This is unacceptable.

I therefore urge you to prohibit the use of rubber ring castration/docking in lambs and cattle over 6 weeks old.

Small, A. H., Belson, S., Holm, M., & Colditz, I. G. (2014). *Efficacy of a buccal meloxicam formulation for pain relief in Merino lambs undergoing knife castration and tail docking in a randomised field trial*. *Australian Veterinary Journal*, 92(10), 381-388. doi: 10.1111/avj.12241

Re Proposals for Significant Surgical Procedures

Long-acting pain relief given at the time of procedure

A practice that meets the criteria for a *significant surgical procedure* should absolutely be required to give pain relief, not only at the time of the procedure, but also a longer-acting analgesic such as NSAIDs.

It could be assumed that procedures carried out by veterinarians would receive long-acting pain relief anyway, but this should be clearly stated. For those procedures permitted to be carried out by any person, it is crucial that this is clearly stated.

Examples of proposals that fall into this category include:

52. Embryo collection via exteriorised uterus

- 54. Liver Biopsy
- 57. Desexing
- 64. Cattle-claw removal
- 66. Cattle-tail docking
- 69. Cattle, sheep and goats- dehorning
- 72. Deer-Develveting
- 74. Horses-tail docking
- 78. Horses- castration
- 80. Pigs-castration

Re proposal 25. Pigs-lying space for grower pigs + litter systems

Min floor lying space of $0.03 \times LW^{0.67}$ /pig (m²) for ALL group-housed pigs
Mandatory forage material provided for all pigs

This proposal implies that if grower pigs are housed outdoor, or inside in a litter system, then this required floor space does not apply. This maximum stocking rate needs to be clearly applied to all pigs. Furthermore, litter systems should become compulsory.

The negative effects of high stocking rates, both psychological and physical stress to the animals, and in terms of decreased performance, have been identified in multiple studies.

Jones et al (2011) concluded that increased group size decreased average daily gain and Back Fat (both linear relationships). ie the higher stocking density the lower the ADG; an indication of stress – likely both social and physical (combating for nutrition).

Moinard et al (2003) reviewed stress risk factors for tail biting in grower pigs. The paper concluded that using a feeding system with five or more grower pigs per feed space increased risks of tail biting, as did a stocking density during the growing phase of 110 kg/m² or greater. The proposed floor area by MPI is already greater than this, so again, I simply urge you to extend the proposal to all group-housed pigs.

Regarding litter-systems, this same paper found that by adding straw to the area once or more per day decreased the risk of tail biting 10-fold. Ironically, Tail docking was also associated with a three-fold increase in the risk of tail biting.

Litter systems have been found to drastically reduce the incidence of both obsessive tail biting and aggressive social behaviour. For example, a comparative study was carried out between pigs housed in deep straw bedding and those confined to barren, slatted pens (Scott et al., 2006). The study found that 1.4% of pigs were removed for tail biting from the straw enclosures, while 11.7% were removed from the slatted pens. The idea of environmental enrichment has also been supported by Beattie et al. (1995), who demonstrated that when provided with a rooting area and straw dispenser, pigs spent 0.02% of their time tail-biting, compared to 0.32% of their time when housed on bare, slatted floors.

In light of the abundant evidence, I urge you to apply the same maximum stocking rate to all group-housed pigs, as well as make litter-systems mandatory.

Jones, R. M., Crump, R. E., & Hermes, S. (2011). Group characteristics influence growth rate and backfat of commercially raised grower pigs. *Animal Production Science*, 51(3), 191-197.

Moinard, C., Mendl, M., Nicol, C. J., & Green, L. E. (2003). A case control study of on-farm risk factors for tail biting in pigs. *Applied Animal Behaviour Science*, 81(4), 333-355. doi: 10.1016/s0168-1591(02)00276-9

Scott, K., Chennells, D.J., Campbell, F.M., Hunt, B., Armstrong, D., Taylor, L., Gill, B.P., and Edwards, S.A. (2006). The welfare of finishing pigs in two contrasting housing systems: Fully slatted versus straw-bedded accommodation. *Livestock Science*, 103, 104-115.

Beattie, V.E., Walker, N. and Sneddon, I.A. (1995) Effects of environmental enrichment on behaviour and productivity of growing pigs. *Animal Welfare* 4, 207-220.

Re proposals 17-19. Layer hens (38-40)

Prohibit the use of cages in the poultry industry

“Colony cages” are not fooling anyone. The stocking rates are still far too high, a wire floor, frustration, feather plucking, barbaric beak trimming- It’s all still there. Get rid of them!! Just intensive factory farming is appalling and a hideous side of NZ that the “clean green” image keeps hidden.

Re Proposed regulations for the transport of live animals from NZ

Live exports should be prohibited

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Jenny Spark s 9(2)(a)
Sent: Saturday, 30 April 2016 4:08 p.m.
To: Animal Welfare Submissions
Subject: Submission

(57)

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision-making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Thankyou,
Jenny Spark

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Emily Rodgers § 9(2)(a)
Sent: Saturday, 30 April 2016 4:11 p.m.
To: Animal Welfare Submissions
Subject: Animal welfare



To the Ministry of Primary Industries,

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Regards,

Emily Rodgers

Sent from my iPad

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Rebecca Coldicutt s 9(2)(a)
Sent: Saturday, 30 April 2016 4:33 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare

59

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Rebecca Coldicutt

s 9(2)(a)

s 9(2)(a)

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Attention:

The information contained in this message and or attachments is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited.

If you received this in error, please contact the sender and delete the material from any system and destroy any copies.

Thank you

#####

From:
Sent:
To:

s 9(2)(a)

Saturday, 30 April 2016 4:35 p.m.
Animal Welfare Submissions

60

To the Ministry of Primary Industries,

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Regards
Amber Burgess

From: Katrina Osgood s 9(2)(a)
Sent: Saturday, 30 April 2016 5:35 p.m.
To: Animal Welfare Submissions
Subject: Submission - Animal Welfare Regulations



To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Regards,

Katrina Osgood



Please consider the environment before printing this email

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Victoria Koch s 9(2)(a)
Sent: Saturday, 30 April 2016 8:01 a.m.
To: Animal Welfare Submissions
Subject: Animal welfare submission

64

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Yours sincerely,
Victoria

From: Eva Nagel s 9(2)(a)
Sent: Saturday, 30 April 2016 8:22 p.m.
To: Animal Welfare Submissions
Subject: Submission on the regulations released for consultation in April 2016

To the Ministry of Primary Industries,

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"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision-making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

'The greatness of a nation and its moral progress can be judged by the way its animals are treated.'
— Mahatma Gandhi

Best regards,
Eva Nagel

From: Bianka Atlas s.9(2)(a)
Sent: Saturday, 30 April 2016 9:49 p.m.
To: Animal Welfare Submissions
Subject: Consultation on animal welfare regulations

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision- making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Yours faithfully
Bianka Atlas

From: Sam Vrij § 9(2)(a)
Sent: Saturday, 30 April 2016 10:03 p.m.
To: Animal Welfare Submissions
Subject: Animal welfare submissions

65
1982

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Regards, Samantha Vrij

From: Maree Martinussen s 9(2)(a)
Sent: Sunday, 1 May 2016 5:08 a.m.
To: Animal Welfare Submissions
Subject: Consultation process not in good faith

6582

To the Ministry of Primary Industries

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Yours faithfully

Maree Martinussen

Sent from my iPad

RELEASED UNDER THE OFFICIAL INFORMATION ACT

From: barbara marlena Simon § 9(2)(a) >
Sent: Sunday, 1 May 2016 8:46 a.m.
To: Animal Welfare Submissions
Subject: regulations released for consultation in April 2016

67
1982

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision- making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

I have been very disappointed by the lack of action and taking responsibility by our MPI in some animal welfare issues which have made the news lately.

Kind regards
Marlena Simon

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Bev Harris s 9(2)(a)
Sent: Sunday, 1 May 2016 8:50 a.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Regulations

(68)

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Regards

Beverley Harris

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Martin Webb s 9(2)(a)
Sent: Saturday, 30 April 2016 4:04 p.m.
To: Animal Welfare Submissions
Subject: Proposed animal welfare regulations

69
CT 1982

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision- making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

--
Martin Webb

s 9(2)(a)

s 9(2)(a)

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: R Arnold s 9(2)(a)
Sent: Saturday, 30 April 2016 9:52 a.m.
To: Animal Welfare Submissions
Subject: Animal Welfare

Follow Up Flag: Follow up
Flag Status: Flagged



To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Annie Potts s9(2)(a)
Sent: Saturday, 30 April 2016 10:08 a.m.
To: Animal Welfare Submissions
Subject: re time permitted for consultation



To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Regards
Annie Potts

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Anna Carr s9(2)(a)
Sent: Saturday, 30 April 2016 10:08 a.m.
To: Animal Welfare Submissions
Subject: RE: Animal Welfare submissions

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

*Kindest Regards
Anna Carr*

Sent from my iPad

From: VeganYogini #9(2)(a)
Sent: Saturday, 30 April 2016 10:15 a.m.
To: Animal Welfare Submissions

73

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

For the love of the animals, give us more time. Honest kiwis would listen to this plea. I love this country and am proud to call it my home. Please hold up the integrity I believe you to have and allow us more time.

Thank you,

Erica Davis
US Expat and Animal Lover

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Matt s 9(2)(a)
Sent: Saturday, 30 April 2016 10:23 a.m.
To: Animal Welfare Submissions
Subject: You must do something to stop abuse

74

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Matt m

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Sarah Macauley s9(2)(a)
Sent: Saturday, 30 April 2016 10:45 a.m.
To: Animal Welfare Submissions
Subject: Submission on Regulations released for consultation April 2016

Importance: High

Follow Up Flag: Follow up
Flag Status: Completed

To the Ministry of Primary Industries,

Please accept this as my submission on the regulations released for consultation in April 2016.

I do not believe you have allowed reasonable or sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Regards,

Sarah Macauley

From: Geraint Scott s 9(2)(a)
Sent: Saturday, 30 April 2016 11:03 a.m.
To: Animal Welfare Submissions
Subject: Animal welfare submission

76

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision- making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Geraint Scott

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Aimee Gestro § 9(2)(a)
Sent: Saturday, 30 April 2016 11:03 a.m.
To: Animal Welfare Submissions
Subject: Submission

77

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Steve & Sarah Page s9(2)(a)
Sent: Saturday, 30 April 2016 9:39 a.m.
To: Animal Welfare Submissions
Subject: animal welfare submission

Importance: High

We are writing to express our deep concern about the welfare of farm stock and other animals used for food or to produce food. The animal welfare review you are currently conducting is in danger of not going far enough to protect the rights and welfare of these animals. We are also concerned that not enough time is being allowed for people to make submissions on the new rules: over 100 pages of new rules and only five weeks for people to respond is not enough time. We do not feel that your consultation time frame is "in good faith"

We would like to bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

We request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Steve and Sarah Page



Virus-free. www.avast.com

From: Susan Durcan § 9(2)(a)
Sent: Saturday, 30 April 2016 12:04 p.m.
To: Animal Welfare Submissions
Subject: Submission on the regulations released for consultation in April 2016.

79

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Sincerely
Susan Durcan

--
Susan Durcan

Mobile: § 9(2)(a)

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Apollo Taito ^{s19(2)(a)}
Sent: Saturday, 30 April 2016 12:19 p.m.
To: Animal Welfare Submissions
Subject: More time please

80

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Sincerely

Apollo Taito

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Joe Zalucki s 9(2)(a)
Sent: Saturday, 30 April 2016 12:18 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare

81

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

*Yours sincerely,
Joe Zalucki*

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Tina Hejrskov s 9(2)(a)
Sent: Saturday, 30 April 2016 12:36 p.m.
To: Animal Welfare Submissions

82
1982

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Kind regards
Tina Hejrskov

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Amy Ardern § 9(2)(a)
Sent: Saturday, 30 April 2016 12:40 p.m.
To: Animal Welfare Submissions
Subject: Consultation

83

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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*Regards,
Amy Ardern*

From: Rhiannon McGrane^{9(2)(a)}
Sent: Saturday, 30 April 2016 1:03 p.m.
To: Animal Welfare Submissions
Subject: New rules for animal welfare

84

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Thanks
Rhiannon

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Vanessa Fyfe-Wood s 9(2)(a)
Sent: Saturday, 30 April 2016 1:48 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Submissions

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Yours sincerely

Vanessa Fyfe

"The greatness of a nation and its moral progress can be judged by the way its animals are treated." [Mahatma Gandhi](#)

From: Issy Power s 9(2)(a)
Sent: Saturday, 30 April 2016 2:50 p.m.
To: Animal Welfare Submissions
Subject: Regulations

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Kath Dewar s 9(2)(a)
Sent: Saturday, 30 April 2016 8:00 a.m.
To: Animal Welfare Submissions
Subject: Not in good faith

87

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Kath Dewar

s 9(2)(a)

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: dot and les s9(2)(a)
Sent: Saturday, 30 April 2016 3:06 p.m.
To: Animal Welfare Submissions

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Dorothy Maiden

s9(2)(a)



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From: § 9(2)(a)
Sent: Saturday, 30 April 2016 3:24 p.m.
To: Animal Welfare Submissions
Subject: submission

89

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Regards
Richard Gelsmar

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Rachel Herriott <s9(2)(a)>
Sent: Saturday, 30 April 2016 9:30 a.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Regulations

(90)

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Kind regards
Rachel Herriott

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Jake Eames § 9(2)(a)
Sent: Saturday, 30 April 2016 9:33 a.m.
To: Animal Welfare Submissions
Subject: Animal Welfare

91
1982

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Allie Howard s 9(2)(a)
Sent: Saturday, 30 April 2016 9:36 a.m.
To: Animal Welfare Submissions
Subject: Animal welfare

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Allie
Sent from Gmail Mobile

From: Michelle Keenan 49(2)(a)
Sent: Saturday, 30 April 2016 9:48 a.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Guidelines

93

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Yours sincerely

Michelle Keenan

From: Margaret HS s 9(2)(a)
Sent: Saturday, 30 April 2016 8:49 a.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Policy

To the Ministry of Primary Industries,

Regarding the regulations released for consultation in April 2016 - a much longer time than five weeks is needed for the regulations and proposed changes to be properly considered. It looks like this is an attempt to rush through legislation without allowing the document to be examined in detail and give the subject the attention it deserves.

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Margaret Hardwick-Smith

941982
RELEASED UNDER THE OFFICIAL INFORMATION ACT

From: Marie Crawford § 9(2)(a)
Sent: Saturday, 30 April 2016 8:19 a.m.
To: Animal Welfare Submissions
Subject: Extension on decision making process

Q4 1982

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Marie Crawford

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Romina Marinkovich s 9(2)(a)
Sent: Saturday, 30 April 2016 8:40 a.m.
To: Animal Welfare Submissions
Subject: Animal welfare submission

(96)

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision-making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Romina Marinkovich



From: § 9(2)(a)
Sent: Saturday, 30 April 2016 8:49 a.m.
To: Animal Welfare Submissions
Subject: Review of Animal Welfare Regulations

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Kind regards

Anna van den Bosch

Anna van den Bosch
Events Co-Ordinator

§ 9(2)(a)

From: Susi Peterson § 9(2)(a)
Sent: Saturday, 30 April 2016 9:12 a.m.
To: Animal Welfare Submissions
Subject: We need more time

(98)

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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Susi Peterson

Sent from my Samsung device

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Nadine Williams V s 9(2)(a)
Sent: Saturday, 30 April 2016 9:28 a.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Regulations

(99)

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

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"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks. You have passed a law making animals sentient beings and therefore should be given the same rights as humans. Is it because you put a lesser value on their lives that you are trying to rush this and in theory consider it to be of less importance?

Regards
Nadine Williams

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Nadine Williams V s 9(2)(a)
Sent: Wednesday, 18 May 2016 5:24 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

MPI Animal Welfare Codes Submission

Nathan Guy Minister for Primary Industries

In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and I ask that a more realistic time frame be given for the public to have our say.

I suggest a period of five weeks be given to each section of the proposed welfare regulations.

While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, I ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history¹. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare². I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

1) From 5.3m dairy cows in 2007 to 6.4m in 2012 (23% increase in just 5 years) Statistics NZ

2) Switzerland banned cages for hens in 1992

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on:</p> <ul style="list-style-type: none"> a. the species and size of an animal b. the manner of use of an animal (circus) c. the location of the animal (slaughter premises) <p>I support the proposed infringement penalty.</p>
2	All animals	Use of goads
		<p>I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.</p>
3	All animals	Twisting an animal's tail
		<p>I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.</p>

Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading¹, only one individual was prosecuted in relation to the footage², presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) http://safe.org.nz/nz-dairy-industry-exposed 2) https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</p>
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China

		The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across Cook Strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed
		<p>I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to <4 degrees Celsius renders crustacean insensible and propose that either:</p> <p>a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR</p> <p>b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to <4 degrees Celsius renders crustacean insensible.</p> <p>I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.</p>
13	Goats	Tethering requirements
		<p>I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ.</p> <p>I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500.</p> <p>I also propose that as goats are social animals, all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300.</p> <p>1. Miranda-de la Lama, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10</p>
14	Horses	Use of a whip, lead, or any other object
		I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.
15	Horses	Injuries from equipment such as halter, head ropes and saddles
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.

16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met. 1) Sections 9, 68 Animal Welfare Act 1999
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully¹. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens². Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes³) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> • Sufficient length of perching space to allow all birds to perch at the same time; and • Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night. <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. 'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'⁴.</p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens⁴. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage 2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57. 3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832. 4) Cooper, J.J. and Ablentosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>

20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		Proposal: I support the proposal that all pigs have access to a dry sleeping area. Penalty: I support the proposed infringement penalty of \$300.
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believe the formula intended by MPI should read "live weight^{0.67} (kg)" but instead it reads "live weight 0.67(kg)" which translates to an Area = 0.03 * liveweight * 0.67(kg) and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. (2006) which ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI². A k-value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen; not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage" ⁴. If these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. I would like the regulations to be</p>

		<p>clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m²) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m²) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>1) Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spooler, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>2) Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&context=kaesrr</p> <p>3) ibid. Page 9</p> <p>4) "ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 <https://www.mpi.govt.nz/document-vault/1446></p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates²³.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>1) "National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</p> <p>2) Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</p> <p>3) KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. http://www.sciencedirect.com/science/article/pii/S0167587711003564</p>
28	Pigs	Provision of nesting material
		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for</p>

		<p>clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p> <p>1) Chaloupková, H. "The effect of nesting material on the nest-building and maternal ... - NCBI." 2011. http://www.ncbi.nlm.nih.gov/pubmed/20889685</p>
29	Rodeos	Fireworks
		<p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010) And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 42,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses
		<p>I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.</p>
31	Cattle	Milk stimulation
		<p>I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.</p>
32	Cattle and Sheep	Vehicular traction in calving or lambing
		<p>I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.</p>
33	Cattle and Sheep	Ingrown horns
		<p>I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.</p>
34	Stock transport	Cuts and abrasions
		<p>I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.</p>
35	Stock transport	Animals with ingrown horns

		I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities

		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading¹, only one individual was prosecuted in relation to the footage², presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) http://safe.org.nz/nz-dairy-industry-exposed 2) https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		<p>I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading¹. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p>1) http://safe.org.nz/nz-dairy-industry-exposed</p>
Proposed	Young Calves	Same day slaughter
		I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves¹. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.

45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age; therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		<p>I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.</p>
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper does not demonstrate that:</p> <ul style="list-style-type: none"> a) this is in fact the case in calves <5 days of age or b) that these calves are not experiencing significant hunger or c) that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study. <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>2) Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves, we propose an increase in the infringement penalty to \$1000.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		<p>I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.</p>
50	Young Calves	Transport by sea across Cook Strait prohibited
		<p>I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.</p>

Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I propose that all cats and dogs sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding

		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. Pain relief must be used at the time of this procedure.
63	Cattle	Teats
		<p>I support the proposal for supernumerary teat removal of animals >6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals <6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that:</p> <ul style="list-style-type: none"> a) the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age <ul style="list-style-type: none"> i) infringement penalty of prosecution b) pain relief is required for any supernumerary teat removal procedure regardless of age <ul style="list-style-type: none"> ii) infringement penalty of prosecution c) procedure is performed using sterilised equipment <ul style="list-style-type: none"> iii) infringement penalty of \$500 d) any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian <ul style="list-style-type: none"> iv) infringement penalty of prosecution
64	Cattle	Claw removal
		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.

65	Cattle	Teat occlusion
		I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking
		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking
		I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking.

		<p>Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months.</p> <p>I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male.</p> <p>I support the proposed penalty of prosecution for infringements in sheep > 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use.</p> <p>I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep < 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep <2 months of age and a penalty of \$300 for lack of NSAID use.</p>
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses
		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		<p>I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty.</p> <p>I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.</p>
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.
79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the

		time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.
80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.

Submitted by:
Nadine Williams

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MPI Animal Welfare Codes Submission

Nathan Guy
Minister for Primary Industries

In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and I ask that a more realistic time frame be given for the public to have our say.

I suggest a period of five weeks be given to each section of the proposed welfare regulations.

While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, I ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history¹. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare². I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

1) From 5.3m dairy cows in 2007 to 6.4m in 2012 (23% increase in just 5 years) Statistics NZ

2) Switzerland banned cages for hens in 1992

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on:</p> <ol style="list-style-type: none"> the species and size of an animal the manner of use of an animal (circus) the location of the animal (slaughter premises) <p>I support the proposed infringement penalty.</p>
2	All animals	Use of goads
		<p>I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.</p>
3	All animals	Twisting an animal's tail
		<p>I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.</p>
Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading¹, only one individual was prosecuted in relation to the footage², presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <ol style="list-style-type: none"> http://safe.org.nz/nz-dairy-industry-exposed https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/
4	Dogs	Pinch and Prong collars
		<p>I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.</p>
5	Dogs	Injuries from collars or tethers

		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China
		The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across cook strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed

		<p>I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to <4 degrees Celsius renders crustacean insensible and propose that either:</p> <p>a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR</p> <p>b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to <4 degrees Celsius renders crustacean insensible.</p> <p>I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.</p>
13	Goats	Tethering requirements
		<p>I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ.</p> <p>I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500.</p> <p>I also propose that as goats are social animals all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300.</p> <p>1. Miranda-de la Lama, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10</p>
14	Horses	Use of a whip, lead, or any other object
		<p>I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.</p>
15	Horses	Injuries from equipment such as halter, head ropes and saddles
		<p>I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.</p>
16	Horses and Donkeys	Tethering requirements
		<p>I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.</p>
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		<p>I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met:</p> <p>1) Sections 9, 68 Animal Welfare Act 1999</p>
18	Layer Hens	Stocking densities
		<p>Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.</p>
19	Layer Hens	Housing and equipment design

		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully¹. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens². Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes³) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> • Sufficient length of perching space to allow all birds to perch at the same time; and • Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night. <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. 'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'.</p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens⁴. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage</p> <p>2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57.</p> <p>3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.</p> <p>4) Cooper, J.J. and Ablettosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>
20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		Proposal: I support the proposal that all pigs have access to a dry sleeping area.

		Penalty: I support the proposed infringement penalty of \$300.
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believe the formula intended by MPI should read "live weight^{0.67} (kg)" but instead it reads "live weight 0.67(kg)" which translates to an Area = 0.03 * liveweight * 0.67(kg) and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. (2006) which ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI². A k-value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen³ not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage"⁴. If these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. I would like the regulations to be clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m²) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m²) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>1) Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spoolder, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>2) Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&context=kaesrr</p> <p>3) ibid. Page 9</p> <p>4) "ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 <https://www.mpi.govt.nz/document-vault/1446></p>
26	Pigs	Dry sow stalls

		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	<p>Size of farrowing crates</p>
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC¹. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates^{2,3}.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>1) "National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</p> <p>2) Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</p> <p>3) KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. http://www.sciencedirect.com/science/article/pii/S0167587711003564</p>
28	Pigs	<p>Provision of nesting material</p>
		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust¹</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p> <p>1) Chaloupková, H. "The effect of nesting material on the nest-building and maternal ... - NCBI." 2011. http://www.ncbi.nlm.nih.gov/pubmed/20889685</p>
29	Rodeos	<p>Fireworks</p>
		<p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010) And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 42,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>

30	Exotic animals	Used in circuses
		I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.
31	Cattle	Milk stimulation
		I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.
32	Cattle and Sheep	Vehicular traction in calving or lambing
		I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.
33	Cattle and Sheep	Ingrown horns
		I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.
34	Stock transport	Cuts and abrasions
		I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.
35	Stock transport	Animals with ingrown horns
		I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats

		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities
		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading¹, only one individual was prosecuted in relation to the footage², presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) http://safe.org.nz/nz-dairy-industry-exposed 2) https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves

		<p>I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading'. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p>1) http://safe.org.nz/nz-dairy-industry-exposed</p>
Proposed	Young Calves	Same day slaughter
		<p>I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p>
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves'. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		<p>I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.</p>
45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age' therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		<p>I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.</p>

47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper does not demonstrate that:</p> <ul style="list-style-type: none"> a) this is in fact the case in calves <5 days of age or b) that these calves are not experiencing significant hunger or c) that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study² <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>2) Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves we propose an increase in the infringement penalty to \$1000.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		<p>I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.</p>
50	Young Calves	Transport by sea across Cook Strait prohibited
		<p>I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.</p>
Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		<p>I support the prohibition of hot branding and the penalty of prosecution.</p>
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		<p>I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).</p>
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		<p>I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians</p>

		and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I propose that all cats and dogs sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding
		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws

		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. Pain relief must be used at the time of this procedure.
63	Cattle	Teats
		<p>I support the proposal for supernumerary teat removal of animals >6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals <6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that:</p> <p>a) the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age</p> <p>i) infringement penalty of prosecution</p> <p>b) pain relief is required for any supernumerary teat removal procedure regardless of age</p> <p>ii) infringement penalty of prosecution</p> <p>c) procedure is performed using sterilised equipment</p> <p>iii) infringement penalty of \$500</p> <p>d) any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian</p> <p>iv) infringement penalty of prosecution</p>
64	Cattle	Claw removal
		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.
65	Cattle	Teat occlusion
		I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking
		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the

		use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking
		I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking. Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months. I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male. I support the proposed penalty of prosecution for infringements in sheep > 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use. I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep < 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep <2 months of age and a penalty of \$300 for lack of NSAID use.
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking

		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses
		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty. I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.
79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.
80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best

		interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.

RELEASED UNDER THE OFFICIAL INFORMATION ACT

From: Chintan s 9(2)(a)
Sent: Saturday, 30 April 2016 7:09 a.m.
To: Animal Welfare Submissions
Subject: Animal welfare issue..

100

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.
Sent from my iPhone

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