

- \* neighbours is the first sign that a dog may be inappropriately treated - the inspectors should be able to check the conditions in which the dog is being kept and not just respond to barking complaints. Multiple such offences should lead to criminal prosecution.

#### 10 Dogs & Cats - Drowning Dogs and Cats

Fully support placing this prohibition in regulation so that it is absolutely clear that drowning cats and dogs is inhumane and unacceptable. Fully support this being a prosecutable regulation offence with criminal conviction.

### 12.0 Surgical and Painful Procedures Regulatory Proposals

#### 12.4 The Proposals

##### 56 Cats - declawing

Fully support a specific regulation dealing with declawing of cats. Fully support this being a prosecutable regulation offence which includes a criminal conviction.

Do NOT support any circumstance where a cat is declawed as I do not believe this could ever be in the best interest of the cat - declawing is inhumane (it involves amputation of the third and final toe bones and may leave the cat in chronic pain; declawed cats are unable to defend themselves or to express natural behaviour like climbing and scratching. It is only done for the convenience of humans, there are much more humane alternatives such as fitting nail caps).

##### 57 Companion animals - desexing

Fully support this proposal. I do not believe veterinary nurses have the appropriate training to perform this procedure. However there may be situations (such as in remote rural areas) where a veterinarian is unavailable but I still believe that a vet should be performing this procedure.

##### 59 Dogs - dog debarking

Fully support a specific regulation dealing with debarking of dogs. Fully support this being a prosecutable regulation offence which includes a criminal conviction. Do NOT support dog debarking as this removes a key means of communication by the dog. Debarking may cause scar tissue and is often temporary and may need to be done over and over again. A debarked dog would be unable to alert its owners to danger or intruders. I do not believe this could be in the best interests of the dog. As with declawing of cats, this is a procedure done for the convenience of humans rather than with the welfare of the dog in mind.

Regards,

Elene (Helen) Anderson

s 9(2)(a)

**From:** Fiona Constantine s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 4:59 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare proposed regulations feedback submission form

Alexandra Hume

s 9(2)(a)

62. *The proposed regulation states: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.*

*Must only be performed for therapeutic reasons*

*Pain relief must be used at the time of the procedure.*

*and*

61. *The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:*

*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*

I strongly disagree with these two proposals

- 
- Any democratic voting system should include the opinion of all relevant parties and in no way omit the vote of truly well informed sectors eg NZKC and professional breeders.
- I have owned three Dobermanns all tail-banded - all happy healthy dogs
- It is a great disappointment that the study regarding myths of tail-banding was ignored
- I understand that not all front dew claws are articulated and the breed specifics have been ignored in this instance and MPI have been incorrectly advised.
- I have worked in a veterinary practice and seen injuries and damage with dew claws torn that have been left on and this has caused significant pain and suffering to the dog - no other country has proposed this procedure
- Over 170 countries do not ban tail docking - why has this not been mentioned in the documentation from MPI

Alexandra Heather Hume

**From:** Barbara Alexander s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 4:56 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission  
**Attachments:** Service agreement.pdf; Service agreement\_0001.pdf; Service agreement\_0002.pdf; Service agreement\_0004.pdf

PLease find submission from a breeder of 46 years of Dobermanns

Barbara Alexander

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*At The Home of Dignified Defenders*



s 9(2)(a)

Barbara and Greg Alexander  
& Maribyn Wissmer

s 9(2)(a)

#### Animal Welfare Proposed regulations feedback submission form

- 62- The proposed regulation states; Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian.  
Must only be performed for therapeutic reasons  
Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

I am a member of the New Zealand Kennel Club (NZKC) and am a registered breeder of pedigree dogs.

The NZCDB as an organization was established in 2004 and our membership is focussed on the welfare of tail shortened breeds. We operate as a fully audited and regulated group under the umbrella of the NZKC with the approval of the National animal Welfare Advisory Committee (NAWAC)

I have never had a complaint or issue arise from any litter that I have had banded by an accredited tail bander to the best of my knowledge I understand that as an accredited group they have performed tail shortening on over 10 500 neonate puppies without incident since 2005.

I am of the understanding that the procedure of tail banding (described by the NAWAC approved scheme) is vastly different from the process of tail amputation. TAIL BANDING IS NOT A SURGICAL PROCEDURE.

Our puppies are still drinking from their mother while the bands are put on.

The breed I am associated with and that are banded by an accredited tail bander traditionally docked dogs that still perform their duties that they were designed for.

I understand that in 2012 NAWAC agreed and suggested a study should be completed to dispel myths around the process of tail banding, yet to date, this has not been carried out by NAWAC so I am surprised that this proposal has taken shape.

I Understand that MPI partly funds both the RSPCA and NAWAC yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not



factual. I also understand that the governing body of professional dog world Namely the NZKC has over 6000 members, but were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

Fact. When breeding in Australia I had 2 litters of Dobermanns with undocked tails, and three of them when a few months old after breaking their tails had to be shortened by a vet, which became a major surgical intervention. (Documentation can be provided)

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I understand that over 170 countries do not ban the tail shortening procedure however these countries are not spoken about in any documentation produced by MPI.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for tail shortening.

I am of the belief that there is currently a process in place for the SPCA to act on individual cases that perform a tail shortening procedure illegally on a litter of non-registered NZKC members neonate puppies, however in the last 4 years I only know of 2 cases where the SPCA has acted on this information.

61. The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

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

Hind limb dew claws: non-articulated (greater than or equal to four days of age)

Must be performed by a veterinarian or veterinary student under supervisions; and

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

When performing a dew claw removal, I complete this process in a neonate puppy 4 days of age or under. At this time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

No other country in the world has proposed this procedure should not be practiced as the health and welfare of the dog will be compromised.

As a professional dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and the dew claw if left on would result in significant pain and suffering to the dog.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder in an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for dew claw removal.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only-NZKC) have also not been included in the proposal to not allow this process to remain as is.

Signed

*Barbara Alexander*

*Membership*

s 9(2)  
(a)



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**From:** Nicole Brice s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 4:56 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Dog Tail Docking Submission  
**Attachments:** Nicole Brice - MPI Submission 2016.pdf

Hi there,

Please find attached my submission regarding the proposed new regulations around tail docking in dogs.

Regards,  
Nicole Brice

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Ministry for Primary Industries  
Manatū Ahu Matua



**Animal welfare proposed regulations feedback submission form**

Your name: Nicole Brice

Your organisation (if applicable): \_\_\_\_\_

Your contact details: [REDACTED] [REDACTED] [REDACTED]

Your feedback: Dew claws Removal - I do Not support  
the proposed regulations to only remove dew claws for Therapeutic  
reasons. Dew claws should still be able to be removed but  
I agree this should be done by a vet or by an accredited  
person under a quality assurance scheme. Dew claw removal  
should be allowed to be carried out on puppies 4 days or younger  
by an accredited person as this involves minimal pain & distress  
performed correctly, there is no cutting through bone. Prohibiting  
the removal of dew claws (unless for Therapeutic reasons)  
will be very difficult to enforce.

Tail Docking - I agree tail docking should be done by  
a vet but the quality assurance scheme under The Dogs Code  
of Welfare 2010 should remain to allow banding of tails  
on puppies under 4 days old, by Accredited Banders. The  
MPI Regulations are attempting to prohibit an already  
approved procedure and this is unreasonable and a case  
of MPI going beyond their regulatory power.

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](mailto: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.

539

**From:** Angela Thompson § 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 4:48 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** PLEASE act humanely stop animal suffering PLEASE

Please review your policies to ensure that animals are treated humanely. Ban the use of crates and cages for pigs and chickens. These are barbaric and promote profound cruelty and suffering for these animals. Please make the right choice. Lets change how we care for our animals to provide a healthier range of foods for all.

PLEASELISTEN>

Warm regards  
Angie Thompson

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**From:** Barbara Alexander § 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 4:47 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission  
**Attachments:** Service agreement.pdf; Service agreement\_0001.pdf; Service agreement\_0002.pdf; Service agreement\_0003.pdf

Please find att. my Submission.

Marilyn Wissmer.

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*The Home of Dignified Defenders*



s 9(2)(a)

Barbara and Greg Alexander  
L Marilyn Wissmer

s 9(2)(a)

Animal Welfare Proposed regulations feedback submission form

- 62- The proposed regulation states; Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian.  
Must only be performed for therapeutic reasons  
Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

I am a member of the New Zealand Kennel Club(NZKC)and am a registered breeder of pedigree dogs.

The NZCDB as an organization was established in 2004 and our membership is focussed on the welfare of tail shortened breeds. We operate as a fully audited and regulated group under the umbrella of the NZKC with the approval of the National animal Welfare Advisory Committee (NAWAC)

I have never had a complaint or issue arise from any litter that I have had banded by an accredited tail bander to the best of my knowledge I understand that as an accredited group they have performed tail shortening on over 10 500 neonate puppies without incident since 2005.

I am of the understanding that the procedure of tail banding(described by the NAWAC approved scheme) is vastly different from the process of tail amputation. TAIL BANDING IS NOT A SURGICAL PROCEDURE.

Our puppies are still drinking from their mother while the bands are put on.

The breed I am associated with and that are banded by an accredited tail bander traditionally docked dogs that still perform their duties that they were designed for.

I understand that in 2012NAWAC agreed and suggested a study should be completed to dispel myths around the process of tail banding, yet to date, this has not been carried out by NAWAC so I am surprised that this proposal has taken shape.

I Understand that MPI partly funds both the RSPCA and NAWAC yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not



factual. I also understand that the governing body of professional dog world Namely the NZKC has over 6000 members, but were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

Fact. When breeding in Australia I had 2 litters of Dobermanns with undocked tails, and three of them when a few months old after breaking their tails had to be shortened by a vet, which became a major surgical intervention. (Documentation can be provided)

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I understand that over 170 countries do not ban the tail shortening procedure however these countries are not spoken about in any documentation produced by MPI.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for tail shortening.

I am of the belief that there is currently a process in place for the SPCA to act on individual cases that perform a tail shortening procedure illegally on a litter of non-registered NZKC members neonate puppies, however in the last 4 years I only know of 2 cases where the SPCA has acted on this information.

61. The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

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

Hind limb dew claws: non-articulated (greater than or equal to four days of age)

Must be performed by a veterinarian or veterinary student under supervisions; and

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

When performing a dew claw removal, I complete this process in a neonate puppy 4 days of age or under. At this time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

No other country in the world has proposed this procedure should not be practiced as the health and welfare of the dog will be compromised.

As a professional dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and the dew claw if left on would result in significant pain and suffering to the dog.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

46

I understand that another major stakeholder in an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for dew claw removal.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only-NZKC) have also not been included in the proposal to not allow this process to remain as is.

Signed

*M J Wismer*

s 9(2)(a)



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**From:** s.little s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 4:47 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare Submission

*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.*

Kind regards  
Simone Little



Virus-free. [www.avast.com](http://www.avast.com)



**From:** Fiona Constantine s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 4:31 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare proposed regulations feedback submission form

Fiona Constantine  
s 9(2)(a)

My feedback:

Re: 62

62. *The proposed regulation states: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.*

*Must only be performed for therapeutic reasons*

*Pain relief must be used at the time of the procedure.*

I disagree with this proposal :-

It is totally illogical for less informed parties to have a stronger voice than professional, experienced and knowledgeable groups such as registered professional dog breeders, NZ Kennel Club members (with over 6000 members) and members of the NZCDB.

The study to dispel myths regarding tail banding was suggested and agreed upon in 2012 by NAWAC yet nothing has been done since to honour this agreement.

An overall decision should not treat cross-bred and non-pedigree dogs the same as professionally bred pedigree dogs.

More than 170 countries do not ban tail shortening procedures but there is no reference to this fact by MPI

It appears that much informed objection to these proposed regulations (re tail banding and dew claw removal) is being conveniently ignored in order to satisfy the less informed. Such concerns are due to the fact that major stakeholders in MPI appear to have great influence in supporting this proposal even though some are less qualified than most of the professional, knowledgeable and experienced objectors. This is quite undemocratic and of serious concern as wrong decisions can be made under such imbalanced circumstances.

My Dobermann Plum is tail banded and is performing a task she was bred for as a therapy dog with the SPCA Outreach programme.

Fiona Constantine

**From:** Pat Plimmer s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 4:25 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Emailing: 1  
**Attachments:** 1.jpg

Attached submission Animal Welfare

Pat Plimmer

Your message is ready to be sent with the following file or link attachments:

1

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

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Ministry for Primary Industries  
Manatū Ahu Matua



Animal welfare proposed regulations feedback submission form

Your name: Pat Plimmer

Your organisation (if applicable) New Zealand Kennel Club

Your contact details: s9(2)(a)

Your feedback:

I feel breeders should be able to decide whether to dock or not. They should have freedom of choice. As long as it is done by an accredited border under NZKC quality assurance scheme within 72 hours of birth.

As for dew claws they are a hazard if left on in many breeds. Personally I have had dogs that <sup>had</sup> were not removed when young that had them removed at an older age. This caused the dogs much pain and major surgery.

Latest I heard of a dog playing with another dog with dew claws that pierced a hole in his chest and needed stitches.

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 [ahupolicy@mpi.govt.nz](mailto:ahupolicy@mpi.govt.nz)

Submission close 5pm 19 May 2016

An extension of your submission period may be granted if you can demonstrate that you have been prevented from submitting your feedback by circumstances beyond your control. If you are unable to submit your feedback by the deadline, please contact the Animal Welfare Policy team at [ahupolicy@mpi.govt.nz](mailto:ahupolicy@mpi.govt.nz) as soon as possible. Please note that the deadline for submission of feedback is 5pm on 19 May 2016. Feedback received after this time will not be considered. Please note that the deadline for submission of feedback is 5pm on 19 May 2016. Feedback received after this time will not be considered.



**From:** Sue & Jan § 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 4:17 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** concerned and getting wild...basic rights here!

*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.*



**From:** Rachel Du Val s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 4:15 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare Policy

*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.*

*Thank you,*

RACHEL DU VAL

**From:** Ashley Carlisle s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 3:57 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Rights

*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.*

*Yours Sincerely,  
Ashley Carlisle*

✓ (547)

**From:** Chris Maisey s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 3:24 p.m.  
**To:** Animal Welfare Submissions  
**Cc:** Todd.MullerMP@parliament.govt.nz; nathan.guy@national.org.nz  
**Subject:** Submission on the Animal Welfare Act Review

[animal.welfaresubmissions@mpi.govt.nz](mailto:animal.welfaresubmissions@mpi.govt.nz)

From

s 9(2)(a)

[Todd.MullerMP@parliament.govt.nz](mailto:Todd.MullerMP@parliament.govt.nz)

[nathan.guy@national.org.nz](mailto:nathan.guy@national.org.nz)

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

17<sup>th</sup> May 2016

**Submission on the Animal Welfare Act Review**

Dear Sirs

As an owner of a working gundog; I would like to put forward my submission.

I request that tail banding and dew claw removal of working gundog puppies by accredited practitioners continues to be allowed in NZ as is the current approved practice.

The Accredited Banders Scheme is audited by the NZ Kennel Club to ensure compliance with agreed protocols and current Code of Animal Welfare.

Working gundogs with long whippy tails and with dew claws left on can suffer terrible damage whilst hunting through heavy vegetation and thick brambles.

Their fast tail action often leads to tearing and bleeding to the tail which is painful and extremely difficult to treat.

This is a repetitive injury that worsens every time the dog indulges in the work that they enjoy.

Humanely shortening the tail and removing dew claws at a few days old before the joint has formed eliminates a huge risk of injury.

The argument being put that vets do not see many working gundogs with damaged tails is flawed because most of these dogs were humanely docked at a few days old, thus preventing damage from happening.

The only resolution for an adult dog suffering from chronic tail damage is a painful and traumatic amputation.

For the welfare of working gundogs in NZ, I ask that you consider this practice to be allowed to continue.



I attach photos of my working Labrador. She has never had her tail docked and you can see the damage that is done to her tail in the course of a days hunting in heavy cover.  
It causes her considerable aggravation and discomfort in the following days

Thank you for taking the time to read this submission.

Yours faithfully

Chris Maisey

s 9(2)(a)







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✓ (548)

Out of Scope

**From:** Carol Kerr s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 3:21 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submissions for change in Animal Welfare Act  
**Attachments:** Animal Welfare proposed regulations feedback submission form.odt  
**Importance:** High

Please find attached my submissions against the proposed changes

Regards  
Carol Kerr  
s 9(2)(a)

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W

## Animal Welfare proposed regulations feedback submission form

Carol Kerr

s 9(2)(a)

As a Breeder and Qualified Veterinary Nurse with over 20 years experience , my submissions to the proposed changes are firm and listed

I would also like to add that my dogs get breakfast every morning which is more that some children in NZ . They are housed and cared for better than some of our children and NEVER go without medical treatment .

Shame, shame on a country that puts tail banding and dew claw issues before , starving , abused children .

62. The proposed regulation states: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

Must only be performed for therapeutic reasons

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

I am a member of the New Zealand Kennel Club (NZKC) and am a registered breeder of pedigree dogs.

I am an accredited member of the New Zealand Council of Docked Breeds (NZCDB) and have had my animal husbandry skills signed off by a veterinarian, who must complete my application for accreditation by either witnessing neonate puppies being banded or being in the presence of another accredited bander to enable me to perform tail shortening.

The NZCDB as an organisation was established in 2004 and our membership is focussed on the welfare of tail shortened breeds. We operate as a fully audited and regulated group under the umbrella of the NZKC with the approval of the National Animal Welfare Advisory Committee (NAWAC).

I have never had a complaint or issue arise from any litter that I have completed banding on and to the best of my knowledge I understand that as an accredited group, we have performed tail shortening on over 10 500 neonate puppies without incident since 2005.

I am of the understanding that the procedure of tail banding (described by the NAWAC approved scheme) is vastly different from the process of tail amputation and as an accredited bander I only perform the tail banding procedure under the Animal Welfare Act (No2) 2015 and this is not a surgical procedure.

The breeds that I am associated with and that are banded by me are traditionally docked dogs that still perform their duties that they were designed for.

I understand that in 2012 NAWAC agreed and suggested a study should be completed to dispel any myths around the process of tail banding, yet to date, this has not been carried out by NAWAC so I am surprised that this proposal has taken shape.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

I understand that over 170 countries do not ban the tail shortening procedure however these countries are not spoken about in any documentation produced by MPI.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for tail shortening.

I am of the belief that there is currently a process in place for the SPCA to act on individual cases that perform a tail shortening procedure illegally on a litter of non-registered NZKC members neonate puppies, however in the last 4 years I only know of 2 cases where the SPCA has acted on this information.

61. The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

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

Hind limb dew claws: non-articulated (greater than or equal to four days of age)

Must be performed by a veterinarian or veterinary student under supervisions; and

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

When performing a dew claw removal, I complete this process in a neonate puppy 4 days of age or under. At this time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

No other country in the world has proposed this procedure should not be practiced as the health and welfare of the dog will be compromised.

As a professional dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and the dew claw if left on would result in significant pain and suffering to the dog.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for dew claw removal.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

In my profession as a Groomer/Boarding Kennel facility I have witnessed many incidents of dew claws growing back into the skin of the dog as the pet owner doesn't understand how to trim the nails and often as the dog is of a coated variety, they are not aware of a dew claw being present.

I understand that not all front dew claws are articulated and once again the breed specifics have been ignored in this instance and MPI have been advised incorrectly.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only – NZKC) have also not been included in the proposal to not allow this process to remain as is.

Out of Scope

✓ 549

**From:** s 9(2)(a)  
**Sent:** m.  
**To:** Animal Welfare Submissions  
**Subject:** submission  
**Attachments:** CCE17052016.pdf

Bill Smith

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982



Animal Welfare proposed regulations feedback submission form

Bill Smith

s 9(2)(a)

My feedback:

62. The proposed regulation states: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

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Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

I am a member of the New Zealand Kennel Club (NZKC) and am a registered breeder of pedigree dogs.

As I am an accredited member of the New Zealand Council of Docked Breeds (NZCDB) and have had my animal husbandry skills signed off by a veterinarian, who must complete my application for accreditation by either witnessing neonate puppies being banded or being in the presence of another accredited bander to enable me to perform tail shortening.

The NZCDB as an organisation that has been established for 12 years and our membership is focussed on the welfare of tail shortened breeds. We operate as a fully audited and regulated group under the umbrella of the NZKC with the approval of the National Animal Welfare Advisory Committee (NAWAC).

I have never had a complaint or issue arise from any litter that I have completed banding on and to the best of my knowledge. As an accredited group, we have performed tail shortening on over 10,500 neonate puppies without incident since 2005.

I am of the believe that the procedure of tail banding (described by the NAWAC approved scheme) is vastly different from the process of tail amputation and as an accredited bander I only perform the tail banding procedure under the Animal Welfare Act (No2) 2015 and this is definitely not a surgical procedure.

The breeds that I am associated with and that are banded by me are traditionally docked dogs that still perform their duties that they were designed for.

I understand that in 2012 NAWAC agreed and suggested a study should be completed to dispel any myths around the process of tail banding, yet to date, this has not been carried out by NAWAC so I am surprised that this proposal has taken shape.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

I understand that over 170 countries do not ban the tail shortening procedure however these countries are not spoken about in any documentation produced by MPI, this includes the country of development of many traditionally docked breeds.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for tail shortening.

I am of the belief that there is currently a process in place for the SPCA to act on individual cases that perform a tail shortening procedure illegally on a litter of non-registered NZKC members neonate puppies, however in the last 4 years I only know of 2 cases where the SPCA has acted on this information.

61. The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

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

Hind limb dew claws: non-articulated (greater than or equal to four days of age)

Must be performed by a veterinarian or veterinary student under supervisions; and  
Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

When performing a dew claw removal, I complete this process in a neonate puppy 4 days of age or under. At this time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

No other country in the world has proposed this procedure should not be practiced as the health and welfare of the dog will be compromised.

As a professional dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and the dew claw if left on would result in significant pain and suffering to the dog.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer

such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for dew claw removal.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

In my profession as a Groomer/Boarding Kennel facility I have witnessed many incidents of dew claws growing back into the skin of the dog as the pet owner doesn't understand how to trim the nails and often as the dog is of a coated variety, they are not aware of a dew claw being present.

I understand that not all front dew claws are articulated and once again the breed specifics have been ignored in this instance and MPI have been advised incorrectly.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only – NZKC) have also not been included in the proposal to not allow this process to remain as is.

Yours Sincerely

A handwritten signature in black ink, appearing to be 'Bill Smith', with a long horizontal stroke extending to the right.

Bill Smith  
All Breeds Judge and custodian of pure bred dogs since 1989

Out of Scope

✓ 550

**From:** Marg & Kath § 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 2:41 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submissions On Animal Welfare Regulations  
**Attachments:** Animal Welfare proposed regulations feedback submission.docx

Please find attached my submission on the animal welfare regulations under proposal for change.

Kathryn Stewart

§ 9(2)(a)

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Animal Welfare proposed regulations feedback submission form

Kathryn Stewart

s 9(2)(a)

My feedback:

62. The proposed regulation states: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

Must only be performed for therapeutic reasons

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

I am a member of the New Zealand Kennel Club (NZKC) and am a registered breeder of pedigree dogs. As such I am aware, as an NZKC member, that any tail docking must be performed by an accredited bander that is a member of the New Zealand Council of Docked Breeds (NZCDB) and have had their animal husbandry skills signed off by a veterinarian, who must complete said application for accreditation by either witnessing neonate puppies being banded or being in the presence of another accredited bander to enable them to perform tail shortening.

The NZCDB as an organisation was established in 2004 and membership is focussed on the welfare of tail shortened breeds. They operate as a fully audited and regulated group under the umbrella of the NZKC with the approval of the National Animal Welfare Advisory Committee (NAWAC). To the best of my knowledge I understand that this accredited group, having performed tail shortening on over 10 500 neonate puppies, have done so without incident since 2005. I understand that in 2012 NAWAC agreed and suggested a study should be completed to dispel any myths around the process of tail banding, yet to date, this has not been carried out by NAWAC so I am surprised that this proposal to change the current status has occurred.

I am of the understanding that the procedure of tail banding (described by the NAWAC approved scheme) is vastly different from the process of tail amputation and that accredited banders can only perform the tail banding procedure under the Animal Welfare Act (No2) 2015 and this is not a surgical procedure. Research shows that puppies under four days of age do not have a fully developed nervous system and so banding is not a painful procedure, nor is it a surgical procedure. Having been involved with dogs for over 20 years I have seen no evidence that a banded dog communicates less effectively than a tailed dog or suffers in any other way socially or physically and I have seen no scientific research to support this.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

I understand that over 170 countries do not ban the tail shortening procedure however these countries are not spoken about in any documentation produced by MPI.



I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for tail shortening.

I am of the belief that there is currently a process in place for the SPCA to act on individual cases that perform a tail shortening procedure illegally on a litter of non-registered NZKC members neonate puppies, however in the last 4 years I only know of 2 cases where the SPCA has acted on this information.

The difficulty with ensuring compliance with any regulations changes is that the target group of registered NZKC breeders, whom are breed caretakers, will be enforced to comply by having penalties and sanctions imposed on them whilst any non-registered breeders such as backyard breeders or puppy farmers will not be identified and therefore compliance cannot be mandated or enforced on them as well. Additionally these people are the groups that would, and have, continued to practice banding without an accredited bander completing this task for them. These are the groups that need to be identified and have sanctions imposed on them as they have never and will never fully comply with accreditation standards either by wilful disobedience or neglect.

61. The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

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

Hind limb dew claws: non-articulated (greater than or equal to four days of age)

Must be performed by a veterinarian or veterinary student under supervisions; and

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

When performing a dew claw removal, I complete this process in a neonate puppy 4 days of age or under. At this time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly. However I would be very happy to support the need for this procedure to be completed by an accredited person under a quality assurance scheme, such as that developed for tail docking or by a vet in the future.

As a dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to maintain its function as a herding dog and the dew claw if left on could result in significant pain and suffering to the dog if caught or pulled. In particular the breed coat characteristics of our breed can preclude pet owners from noting or ensuring that dew claws are maintained correctly underneath it and lead to incidents of dew claws growing back into the skin of the dog. Additionally despite having the importance of nail

care advised to pet owners when they collect their puppy, some become lax in nail care maintenance or do not seek assistance from myself or their vet of choice to ensure nail care, in particular dew claws, is completed until too late and the dog itself develops skin irritations or infections secondary to pressure and impairment of skin integrity. Dew claw injuries in older dogs is painful, expensive and distressing both for the dog and owner – all the proposed change is doing is penalizing those responsible breeders whom remove dew claws to prevent injury or neglect via ignorance to puppies and dogs in the future.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I believe that MPI have gone beyond their regulatory power by attempting to capture a rocydye that Parliament never intended to be included.

Compliance would once again become an issue as well as how will this be monitored throughout New Zealand. Once again the registered NZKC breeders, whom are trying to do the right things by their chosen breed to ensure their preservation for the future, become the easy targets to ensure compliance and can have sanctions and penalties imposed on them whilst the non-registered breeders would not be able to be policed effectively to ensure compliance occurs.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only – NZKC) have also not been included in the proposal to not allow this process to remain as is.

Yours sincerely  
Kathryn Stewart

**From:** Casey Regtien § 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 2:23 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 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.*

Casey Regtien  
Sent from Windows Mail

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Out of Scope

✓ (552)

**From:** tony s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 2:21 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations  
**Attachments:** Submission to Proposed Animal Welfare Regulationsv3.docx

Please find attached my submission on the Animal welfare regulations proposals.

Tony Robson

s 9(2)(a)

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**Submission to Proposed Animal Welfare Regulations (Care  
and Conduct and Surgical & Painful Procedures) MPI  
Discussion Paper No:2016/12**

**Submitted by Tony Robson**

**Submissions on Part A Overview of the Proposed  
Regulatory Package**

**1 Compliance and Enforcement Regime**

*-Question 9 Are the Infringement offences and respective fees proposed for breaches of the proposed regulations outlined in Part B appropriate? Should any of the proposals attract higher or lower fees or penalties?*

I do not support any lowering of the Fees. The fees are not high enough as it is. Setting such a low fees sends a message that animal welfare is not important.

*-Question 11 Should any of the proposed regulations, set out in Part B, include a mental element (e.g. intention, knowledge or recklessness)? If so are the penalties for a prosecutable offence under regulation (see Table 2) appropriate for the regulated activity?*

I do not support inclusion of mental element (e.g. intention, knowledge or recklessness) in any of the proposed offences.



## 2 Implementation

**-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?**

Regulations should not require lengthy phase in periods.

**-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?**

The codes of welfare should be consistent with the Animal Welfare Act 1999 and should include all the 5 freedoms (including ability to display natural behaviour) as a minimum requirement and not just provision of adequate food, water and shelter. Suffering is not just physical but psychological as well. Depriving an animal of freedom, social contact and meaningful enrichment (by tethering, caging or crating) is detrimental to their psychological and emotional well-being.

# Submissions on Care and Conduct Regulatory Proposals

## 1. Goat Tethering

It is disappointing that once again the practice of tethering goats has not been appropriately addressed, despite a large number of submissions against this practice in the development of the goat code of welfare in 2012 (MPI, 2012) and a petition of 7329 signatures presented to Parliament (Robson, 2015). I believe the petition submission was sent to you by the Primary Production Committee "for considering future changes to animal welfare codes or legislation" as communicated to me in a letter by Ian McKelvie as Chairperson of the Primary Production Committee.

While I support infringement offences for "low level" offending, the proposed regulation to merely place a \$300 fine for not providing constant access to food, water and shelter is not sufficient enough to protect the welfare of goats.

It is the practice of tethering that is the root cause of much neglect and harm. The minimum standard from the goat code of welfare:

“(d) kids, sick goats, pregnant or nursing does, or goats physiologically compromised in any other way must not be tethered”

Should be revised to include ALL goats.

The practice of tethering goats on roadsides places the animal in a very vulnerable position and many goats have been the victim of cruelty because of this. Goats can easily become tangled in tethers and left unattended on roadsides can remain tangled for hours. Tethering can also cause injuries to the goat and even self- strangulation.

The definitions of “shelter” and “feed” are too broad and need to be clearly defined. As goats are natural browsers they require more than just grass or a bucket of pellets for adequate nutrition. Shelters are often completely inadequate. Small plastic drums and corrugated iron huts that are cold in winter and hot in summer are not adequate shelter.

Goats are a very social animal and do experience loneliness and emotional stress if kept alone without any company or meaningful social relationships. (Miranda- de la Lama and Mattiello, 2010).

The goat code of welfare 2012 admits that “Goats should not be tethered as they are social animals” and “Goats are social animals and need to be provided with one or more companions”. However, this is not reflected in the proposed regulation. Allowing a goat to be tethered indefinitely is not consistent with section C of the Animal Welfare Act 1999, “the opportunity to display normal patterns of behaviour”. A normal behaviour is the way an animal acts in its natural environment. Having adequate exercise and company and the opportunity to play with the animals own kind encourages the expression of normal behaviours. Keeping a goat constantly tethered, socially isolated and in poor conditions has a negative impact on the emotional well-being of the goat. (Briefer and McElligott, 2013).

It is my opinion tethering also breaches section D of the Act “physical handling in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.”

Switzerland and Austria have good animal welfare laws regarding the tethering of goats, permanent tethering is prohibited and company must be provided (Robson, 2015).

The practice of tethering goats should be banned altogether.

**2 Pigs – Size of Farrowing Crates**

Farrowing crates are detrimental to a sow's psychological well-being and natural behaviour. Sweden, Switzerland and Norway have banned farrowing crates and Austria has started phasing out their use. (University of Edinburgh, 2014).

I am of the view that factory farming as a whole contravenes section C of the Animal Welfare Act 1999 "opportunity to display normal patterns of behaviour". I believe a long term strategy for phasing out factory farming needs to be implemented.

### **3 Layer Hens – Opportunity to express normal behaviours in housing systems.**

Colony cages are in effect still battery cages that do not meet the welfare needs of hens. Hens will still spend their life in a cage denied wing flapping, walking, pecking and scratching. Switzerland has phased out all battery farming and Austria is in the process of doing so.

I oppose battery hen farming in any form.

### **4 Rodeos and Fireworks**

Allowing calves to be roped, placing flank straps to horses and Bulls, steer wrestling and other associated practices in these events is nothing but cruelty.

Rodeos are in my view abusive and contravene section d of the Animal Welfare Act 1999, "physical handling in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress."

Rodeos are banned in the UK, the Netherlands, certain States in Australia, the US and Canada.

I submit that Rodeos should be banned altogether.

### **5 All Animals**

#### ***– Twisting an Animals tail***

I am in favour of prohibiting this and making it a regulation.

#### ***-Electric prodders***

I want the use of electric prodders prohibited

***-Use of goads***

I want the use of goads prohibited

**6 Dogs**

***- Pinch and prong collars***

I am in favour of prohibiting Pinch and prong collars.

***-Injuries from Collars of Tethers***

The practice of chaining/tethering dogs needs to be addressed. Dogs are a pack animal and too many live miserable lives chained indefinitely in backyards around the country.

***-Dogs left in Vehicles***

I agree with the proposed regulation and support it.

***-Drowning Dogs (and Cats)***

I agree with prohibiting this and I propose this should be extended to all animals.

**7 Horses and Donkeys**

***-Horses Use a lot of whip, lead or any other object***

I agree this should be prohibited.

***-Horses Injuries from equipment such as halter, head ropes and saddles***

I agree in making this a regulation.

***-Horses and Donkeys – Tethering requirements***

It is my view horses and donkeys should not be tethered.

**8 Llama and Alpaca – Companion Animals**

While I agree with this proposal, I would like to see a regulation like this for goats as they are a social herd animal as well.

**9 Exotic Animals Used in Circuses**

I believe all animals exotic or otherwise should be prohibited from Circuses. Merely placing restrictions is not enough to adequately provide for their needs. The worldwide trend is now to disallow using animals in Circuses.

#### **10 Stock Transport**

##### ***-Cuts and abrasions***

I agree with the proposed regulation

##### ***-Pregnant Animals***

It is my view this should be prohibited entirely.

##### ***-Animals with injured or diseased udders***

I agree with the proposed regulation.

##### ***-Cattle or Sheep with Cancer eye***

I agree with this proposed regulation.

## **Submissions on Surgical and Painful Procedures Regulatory Proposals**

#### **1 Hot Branding All Animals**

I agree with prohibiting hot branding.

#### **2 Dogs**

##### ***-Dogs Cropping the Ears***

I agree in prohibiting this practice.

##### ***-Dogs Tail Docking***



I do not agree with this practice and this should be banned altogether.

### **3 Horses**

#### ***-Blistering, firing or nicking***

I agree with prohibiting these procedures.

#### ***-Tail Docking***

My view is this practice needs to be prohibited.

#### ***-Rectal pregnancy diagnosis of horses***

I agree this procedure should only be performed by a veterinarian.

#### ***-Rectal examination of horses***

I agree this procedure should only be performed by a veterinarian.

#### ***-Caslick's procedure***

I agree this procedure should only be performed by a veterinarian.

#### ***-Castration***

I agree this procedure must only be performed by a veterinarian.

### **4 Various Cattle Sheep Goats Pigs**

#### ***-Cattle Claw Removal***

I agree in this proposal

#### ***-Cattle Teat Occlusion***

I agree with this proposed prohibition.

#### ***-Cattle Tail Docking***

My view is this practice needs to be prohibited.

#### ***-Cattle, Sheep and Goats – Dehorning***

I do not agree that "any" person may undertake this procedure. This procedure should be restricted to a veterinarian.

#### ***-Sheep Mulesing***

I agree with prohibiting this practice.

#### ***-Pigs Castration***

I agree with this proposed regulation.

### **Farm Animals in General**

Regulations around farm animals having shelter need to be implemented as it is a common site to drive past barren paddocks with sheep and cattle having no shelter in the hot sun and other harsh weather conditions.

### **References**

Briefer, E., McElligott, A. (2013) Rescued Goats at a Sanctuary Display Positive Mood after Former Neglect. Retrieved from

[http://animalstudiesrepository.org/cgi/viewcontent.cgi?article=1019&context=acwp\\_asie](http://animalstudiesrepository.org/cgi/viewcontent.cgi?article=1019&context=acwp_asie)

Miranda-de la Lama, G., & Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Retrieved from

[https://www.researchgate.net/profile/Genaro\\_Miranda-De\\_La\\_Lama/publication/248445058\\_The\\_importance\\_of\\_social\\_behaviour\\_for\\_goat\\_welfare\\_in\\_livestock\\_farming/links/0c96052e956f57e297000000.pdf?origin=publication\\_list](https://www.researchgate.net/profile/Genaro_Miranda-De_La_Lama/publication/248445058_The_importance_of_social_behaviour_for_goat_welfare_in_livestock_farming/links/0c96052e956f57e297000000.pdf?origin=publication_list)

National Animal Welfare Advisory Committee. (2012). Animals Welfare (Goats) Code of Welfare 2012 report. Retrieved from <https://www.mpi.govt.nz/document-vault/1430>

Robson, T. (2015) Submission to Primary Production Committee Retrieved from [http://www.parliament.nz/resource/en-nz/51SCPP\\_EVI\\_51DBHOH\\_PET64669\\_1\\_A446666/82e087fd9403a52aa21e8040bfd8a0ea6a3eaca6](http://www.parliament.nz/resource/en-nz/51SCPP_EVI_51DBHOH_PET64669_1_A446666/82e087fd9403a52aa21e8040bfd8a0ea6a3eaca6)

University of Edinburgh (2014) Retrieved from <http://impact.ref.ac.uk/CaseStudies/CaseStudy.aspx?Id=23920>

553

Out of Scope

**From:** Linda + John § 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 2:17 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Calf dehorning

Lowburn Dairy Farms, § 9(2)(a)

To whom it may concern, we like to share our concern about the changes to the proposed new animal welfare act.

As we believe a lot of the changes are good and necessary, the proposal to give calves an pain relief injection before dehorning is without merit.

First to give an injection to a calf is stressful in itself for the calf, second that would mean that just vets can do the dehorning, which is bad, because the vets are not trained in doing so as well as they are often not available at the right time, which results in the calves are older as they should to do the dehorning in the most humane manner, again putting more stress on the calf. Indeed I know a few farmers who had vets doing the dehorning with terrible results, from bleeding to going too deep and even death.

We use the same Dehorning outfit § 9(2)(a) for over 20 years. We never had a calf died, got sick or even stressed. Infact they are up straight after the dehorning, eating and playing with the other calves. We believe that is the right way in doing the dehorning and it should stay the same.

There might be some cowboys around in doing the job without the proper training, but this is easily fixed in sending a vet or consultant around with a dehorner once or twice a season till he is proved to do it to standard.

To give calves an injection before is increasing the stress on them as well as taking away their awareness that they are dehorned, which can increase bleeding and injury, because they are numbed and could bang their head without realising.

So please reconsider and maybe go around with § 9(2)(a) to see for yourself how humane and stressfree this procedure is for the calves.

Thank you

Kind Regards  
Linda and John Mikkelsen  
Lowburn Dairy Farms

Information from ESET Smart Security, version of virus signature database 13499 (20160516)

The message was checked by ESET Smart Security.

part000.txt - decompression could not complete (possible reasons: insufficient free memory or disk space, or a problem with temp folders)

part001.htm - decompression could not complete (possible reasons: insufficient free memory or disk space, or a problem with temp folders)

<http://www.eset.com>

**From:** Ella Martin § 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 2:08 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 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.*



**From:** Jons mac s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 1:33 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Calf Disbudding

We are extremely concerned about the proposed regulations in relation to calf disbudding. For the last 21 years we have been getting our calves disbudded professionally, mainly by the same contractor. The operation is carried out using hot cauterising irons. This is a very quick method and relatively pain free. The calves have a minimum of stress as they remain in their own familiar environment. One calving season we did have M A F disbud our replacement calves using a crush and found it to be a very slow and much more invasive operation with the animals (and operators!) being very stressed up.

If regulations made it necessary to put every calf through a crush & to have pain relief this would be more stressful on the animals who would have to endure another unnecessary procedure. Also the persons (Veterinarians ?) who presumably would have to administer the pain relief would be overwhelmed with the sheer number of animals to treat during the spring season. After seeing the crush method we have been using our local contractor ever since who uses the hot cauterising irons.

Jon & Sharon Pike

s 9(2)(a)

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✓ (556)

**From:** s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 1:28 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission

**Submissions close 19 May.**

*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.*

Sent from Yahoo Mail on Android

✓ 557

Out of Scope

**From:** Anneke Bootsma s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 1:04 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submissions on animal welfare regulations

**Importance:** High

## Submission on animal welfare regulations 17/5/2016

by Mark van Baarle and Anneke van Baarle-Bootsma

s 9(2)(a)

We are clients of Jorgen Hansen (see below). He has dehorned our calves using the Danish designed flat head cauterizing iron for probably 15 years. Every year we rear close to 200 calves and we are very happy with the quality of work he delivers. The calves are handled only very briefly and I can go in and feed them an hour after dehorning with all calves keen to have their feed.

We do not believe pain relief is essential for this method. It will cause the calves to undergo an extra procedure and the stress it will cause with the double handling will only unsettle them for disbudding.

Kind regards,

Mark van Baarle and Anneke van Baarle-Bootsma

**From:** Jorgen Hansen  
**Sent:** Sunday, May 15, 2016 8:40 PM  
**To:** s 9(2)(a)  
**Subject:** Fwd: Submissions on animal welfare regulations

----- Forwarded message -----

**From:** Jorgen Hansen s 9(2)(a)  
**Date:** Sun, May 15, 2016 at 6:37 PM  
**Subject:** Submissions on animal welfare regulations  
**To:**

## Submission on animal welfare regulations





dehorning.mp4

My name is Jorgen Hansen and I come from Denmark. I come from a dairying background and am qualified through Agricultural College in Denmark as a farm manager, which entitles me to buy farmland there.

I came to New Zealand in 1980 and have continued to farm here as a 50/50 sharemilker, eventually selling our cows to buy our own sheep farm, which we owned for 20 years.

I began our disbudding service in August 1991. For the last 20 years I have disbudded on average 34,000 calves per year, servicing about 170 farms over Southland, West and South Otago.

I use a Danish designed flat head cauterizing iron and was trained by one of the vets who designed the irons and developed this method of disbudding.

Because of the farmer demand for this method I have trained four other operators. Two have gone on to full time farming and the remaining two (named below) continue to offer separate disbudding services. Between them they disbud approximately 34,000 calves per year on about 180 farms in addition to what I do. They are:

s 9(2)(a)

s 9(2)(a)

We, as well as our clients, are very concerned that the new proposals for disbudding calves will effectively stop this method being used. Advantages over conventional disbudding include, but are not restricted to;

- \* These irons do only a surface burn, they do not break through the skin. Blood vessels supplying the horn are cauterized so the horn cannot grow, leaving a scab that will drop off in a few weeks.
- \* Calves remain in their own environment, food is not withheld, so that after being disbudded they are in a familiar place and settle very quickly.
- \* It only takes approx 5 seconds for each horn, stress to the calf is minimal.
- \* We do not use a crush. Calves are laid gently on the ground on their side, held tightly between our legs.
- \* So little stress, calves remain calm. Calves get up immediately after being disbudded and most times are seen playing around and feeding in a short time.
- \* Optimum age for disbudding is 4 - 30 days old.
- \* The burn site is completely sterilized by cauterization and there are no infections.

Many of our clients have had calves disbudded by young vets or operators with little practical experience in the correct handling of calves or the correct use of methods of disbudding. In fact, many of our clients have come to us as a direct result of these bad experiences. Irons are often used at too low a temperature, which prolongs the procedure and does not seal the wound. When the calves wake up, their blood pressure rises to normal, causing the unsealed wound to bleed, raising the risk of infection.

We believe that any method that breaks through the skin or goes even deeper into the head is totally unnecessary and cruel, causing great pain, trauma and a slow recovery, often with ongoing infections. We would like to see these inhumane methods completely banned.

While we are pro animal welfare and are pleased so many issues are being looked at, we feel a blanket approach does not allow for the good and best methods to continue. We - and our clients - do not believe pain relief is essential for our method. It will cause the calves to undergo an extra procedure and the stress it will cause with the double handling will only unsettle them for disbudding.



► We hope that our method will be looked at properly and fairly and preferably not by biased vets. We hope to be able to continue to offer this clearly superior, humane method of calf disbudding to our clients. We have young men keen to train and carry on this disbudding procedure and are willing to train others across the country.

Most farmers and certainly our clients are very conscious of the welfare of their animals and are very fussy about who is allowed to handle their stock, especially their calves. They are very concerned that a proposal to make disbudding a vet only procedure effectively takes the control for animal welfare on their farms away from the many farmers who choose not to put their calves through the unnecessary suffering of other methods. There is also great concern that vets will not be able to cope with the high numbers of calves, causing them to be disbudded at a later age, causing more problems.

As our clients are already booked in for this season which begins in July, we all want to know what the plans are for this season, so we can plan and prepare. If pain relief becomes law, who will be able to administer it? The practical issues of working this out on site are huge - with or without a vet.

On Friday 13th May we will be disbudding autumn calves on a property near Winton. The farm owner is happy to invite anyone to come and watch, film and talk about the procedure. If interested please contact Jorgen Hansen by 11th May for more information.

Jorgen & Helen Hansen

§ 9(2)(a)

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SPAMfighter has removed 168 of my spam emails to date.

Do you have a slow PC? Try a free scan!

**From:** Kirstin R s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 12:58 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Ban Factory Farming - have NZ known for fair treatment of ALL animals.

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.

Cheers

Kirstin - an animal lover who likes the fact that NZ has recognised that animals have emotions, but we're not doing enough about it.



Virus-free. [www.avast.com](http://www.avast.com)

**From:** Amber Downie s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 12:43 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

We must be a voice of those that cannot speak for themselves. We must make improvements. This is not something that should just be talked about. These practises are cruel and inhuman.

We need more care taken with bobby calves. The disgusting behaviour and treatment of these baby animals is heartbreaking. The way people think it is ok to treat living beings in this way is horrible.

We need better laws and guidelines and harsher punishment to those who choose to mistreat animals for profit and gain.

Amber R N Downie

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**From:** Kathryn Renfro s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 12:15 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** submission

These updates seek to align 'current practice with changes in societal expectation, scientific knowledge, good practice and available technology.'

This statement says nothing of morality, empathy, or responsibility as stewards of our natural world. The lack of concern for the wellness or treatment of other sentient beings speaks toward the shape and future of society. New Zealand touts itself as a green country - and yet recyclable waste (including plastics and rubber) is regularly burned, batteries are not recycled, and cars which emit massive pollution are permitted on the roads. Animals are abused and severely mistreated - beaten, enslaved, condemned to torture. What does that say for the mental health in this country? That people can cage hens and pigs with no room to turn around or stretch, to never see the sun. That a man can beat an innocent, new born calf for literally no reason... what does that mean for his mental state? For his lack of conscience? For his lack of empathy? What does it say when the government - our representatives - is not first to condemn and punish a practice like that? Treatment of animals and the natural world ought to be top priority... because, not only is it the right thing to do, but it DIRECTLY reflects how we treat fellow humans. How we approach the rest of the world. I have higher hopes for far more stringent policies (and enforcement of those policies) for fellow-animal welfare. I hope these are not only put into effect, but are strengthened to provide greater protection and consideration for the intelligence, awareness, pain, and feelings of our fellow inhabitants.

I sincerely hope the evolution of our society concretely includes advances in animal welfare. Thank you.  
Kathryn



**From:** Kathryn Renfro § 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 12:16 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 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.*

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*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.*

✓ (561)

**From:** Kalmara § 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 11:46 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Emailing: MPI Submission Form  
**Attachments:** MPI.docx

Your message is ready to be sent with the following file or link attachments:

MPI

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

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Sandy Gilbert

s 9(2)(a)

Kalmara founded 35yrs ago (1981)

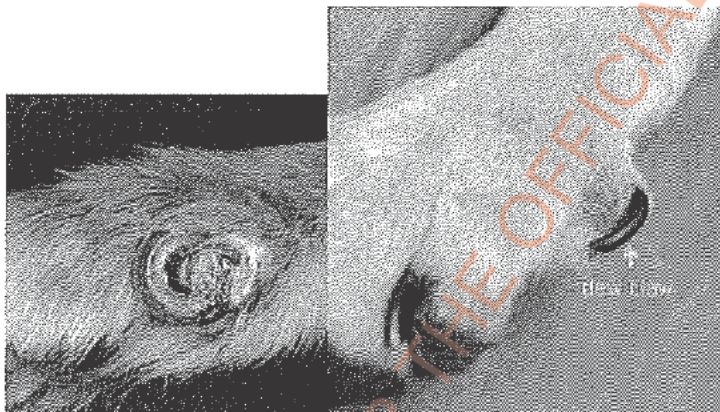
I don't consider Dew Claw removal as "cosmetic surgery"

Rather as a long term benefit for the health and welfare of the dog and prevention of injury to the dog/other dogs/people later in life.

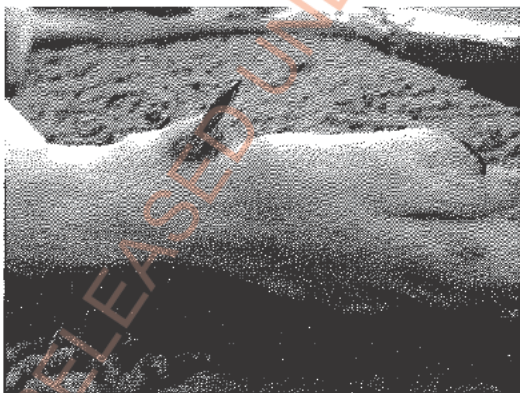
I hold the pups for Dew Claw Removal, at the Vets, done in the first 48 hours after birth at this age  
And with the procedure done correctly there is no cutting through bone. There is NO distress to the  
Pups and they are back with their Dam and suckling within minutes.

I have never heard for seen any complications from this procedure.

Not all Dew Claws are made equal !! Some lie flat against the leg & if not trimmed will grow into the  
Leg



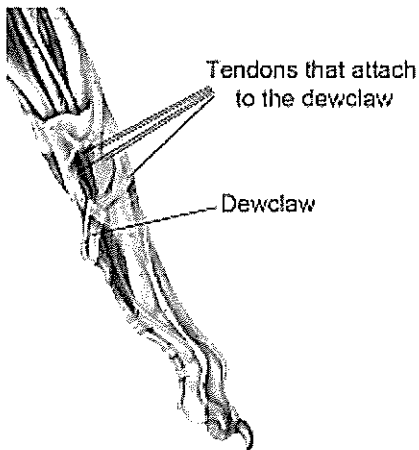
Other Dew Claws tend to stick out, these can cause damage to the dog its self/other dogs/people, as well as getting caught up on any number of items



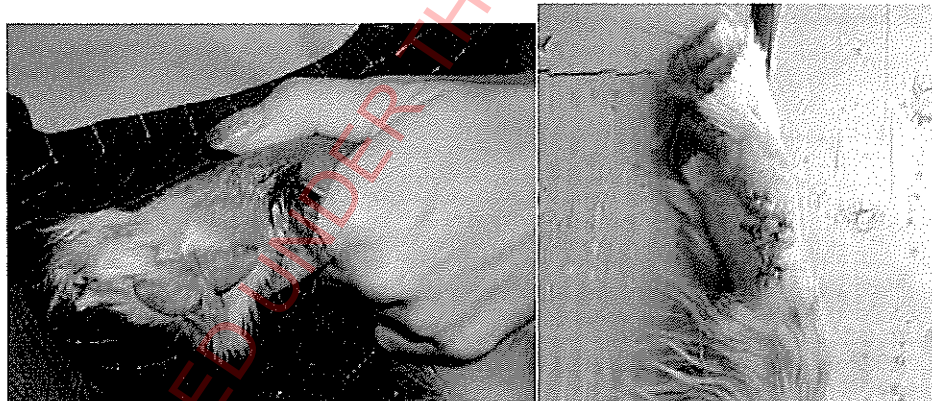




Having to have a Dew Claw removed at a later age, due to injury requires a General Anesthetic and is a major operation, which can, depending on the injury to the Dew Claw, can also involve the tendons.



I have imported several adult dogs with intact Dew Claws and have encountered many problems with the Dew Claws being ripped/torn while playing with other dogs/hunting/digging/jumping.



A Stud Dog caused massive injuries to a bitch during mating, as his Dew Claws ripped her shoulders and sides. He also left me bleeding & scarred when he jumped up & his Dew Claws caught my arm.

Hate to think what could happen to a small child.

We must be able to retain the option to have Dew Claws removed by a Vet to prevent injury and distress, not only to our dogs, but people as well.

**From:** Shirley Herbert s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 11:44 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Proposed regulations feedback  
**Attachments:** Animal Welfare - Proposed Regulations - feedback submission.docx

Hi,

attached is my feedback on the proposed regulations.  
I truly hope you take note of my request to leave tail shortening and dew claw removal as status quo.

Regards,  
Shirley Herbert

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## Animal Welfare: Proposed Regulations

**Shirley Herbert**

s 9(2)(a)

My feedback:

*62. The proposed regulation states: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.*

*Must only be performed for therapeutic reasons*

*Pain relief must be used at the time of the procedure.*

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

I am a member of the New Zealand Kennel Club (NZKC) and I am a registered breeder of pedigree dobermanns.

I am a member of the New Zealand Council of Docked Breeds (NZCDB) and I only use the services of NZCDB accredited members to shorten the tails on my dobermann litters.

The NZCDB as an organisation was established in 2004 and our membership is focussed on the welfare of tail shortened breeds. We operate as a fully audited and regulated group under the umbrella of the NZKC with the approval of the National Animal Welfare Advisory Committee (NAWAC).

I have never had an issue arise from any litter that I have had banded.

When I first bred dobermanns the tails on litters were shortened by my vet using pain relief and then severing the tail, and a few stitches applied to hold a fold of skin over the exposed end. I believe the current practice using accredited tail banders is far superior, is not a surgical procedure and is much preferable to the method that I used thirty years ago with the vet.

The banding is performed in my home with no undue stress to the mother or to the puppies.

I am of the understanding that the procedure of tail banding (described by the NAWAC approved scheme) is vastly different from the process of tail amputation and I am 100% an advocate for tail banding by an accredited bander performing the tail banding procedure under the Animal Welfare Act (No2) 2015 and this is not a surgical procedure.

The dobermann breed that I am associated with and that have their tails shortened by banding, are traditionally docked dogs that still perform their protection duties that they were bred for. In the current environment of home invasions and opportunist crimes of attack when out walking or jogging, the dobermann as the protector is highly valued. A dobermann is sleek and has nothing that a would be attacker can gain a hold of. It is clear that breed specifics were not taken into account when this proposal was documented.

I think the proposal is totally one-sided and I am very surprised that it could be written and circulated for discussion with such obvious and extreme bias.

61. The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

*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*

*Hind limb dew claws: non-articulated (greater than or equal to four days of age)*

*Must be performed by a veterinarian or veterinary student under supervisions; and*

*Pain relief must be used at the time of the procedure.*

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

My dobermann puppies have front dew claw removal performed as a neonate puppy 4 days of age or under. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

As a dog breeder and caretaker of the dobermann, I am fully versed in the damage that a dew claw can cause to the dog if left on. I have a bloodhound with her dew claws and they are exposed, do not wear down and require regular clipping to prevent total curling round and digging into her skin. They are of no use and are not articulated. They require regular manicure attention.

Finally I implore you to retain the status quo and allow me to band tails using an NZCDB Accredited Bander and to remove dew claws on my beloved dobermann breed.

I consider myself to be a caretaker of a dog breed that I love and admire for the purpose it was originally bred for. To leave this breed with a tail is to go against the very reason for its being.

Regards,  
Shirley Herbert

**From:** Michelle Cox s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 11:44 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Factory farming phased out please

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.

Regards,  
Michelle Cox

**From:** Yvonne Warnock s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 11:33 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on animal welfare regulations

Hi I am the calf rearer for Mike Clinton and we rear 500 and 600 calves we use Jorgan Hansen as our calf debudder and find his method of debudding very successful and humane we never have a problem and our calves are up running round and drinking straight away and there is no blood we have used him for several years as we find his method the best. The hygiene is excellent and calves aren't squashed up in a crush if we were to use pain relief this would require a crush and the injection itself would be as painful as the debudding process. I am very fussy with my calves and animal welfare is top of my list for my calves. PLEASE let us carry on with this method of debudding without pain relief.

Regards Yvonne Warnock

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**From:** Victoria Anderson s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 11:23 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** NZ Animal Welfare Act

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.

Regards,  
Victoria Anderson



Out of Scope

✓ 566

**From:** Gamlin, Arvine s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 11:14 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** FW: 'Submission on Animal Welfare Regulations'  
**Attachments:** Support for tail banding docx.docx

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**From:** Gamlin, Arvine  
**Sent:** Tuesday, 17 May 2016 11:13 AM  
**To:** 'Animal.WelfareSubmissions@mpi.govt.nz'  
**Subject:** 'Submission on Animal Welfare Regulations'

- 
- 
- Arvine Gamlin
- s 9(2)(a)

Arvine Gamlin  
s 9(2)(a)

CIA INFORMATION ACT 1982

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## Support for tail banding

It states in the report that the tail has a function for balance. I am yet to see a docked breed having any trouble with balance as far as the tails giving cue I am sure that most breeders would agree with me when I say that the dogs have no trouble tail or no tail in letting you know what they want.

The tail banding is done by an accredited tail bander a process set up by the NZKC. There is a register and all litters bred that have been banded have been registered. Tail banding is done by people who know and understand the breeds and many have been banding tails for decades with little or no issues yet, I know of one case where the tail was surgically removed by a vet and the breeder of that dog had many issues with infection and the like. Tails are banded before the eyes are open and the bone in the tail is not yet firm. Sedating these puppies at this early age surly would be most dangerous for the puppies.

There can be no historical evidence in support for non- banding as all the banded breeds have been banded for centuries and therefore you cannot have evidence on something that cannot be measured. I feel sure that those that banded the breeds in the first place had very good reasons to do so.

I know I speak for all breeders when I say that we breed dogs to ensure the integrity of the breed is maintained. We breed to try and get best specimen, able to do the job that it was bred to do. In the case of the banded breeds this means removing the tails, because with the tail they would struggle to do the jobs bred to do. Case in point in Wales the welsh Pembroke corgi have the tails removed.

**From:** Karen s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 11:07 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 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.*

*Please make every effort that you can to prevent cruelty to animals. Thank you.*

Yours faithfully  
Karen Koschak.

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Out of Scope

✓ 568

**From:** Sarah and Ron s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 10:59 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare proposed regulations feedback submission form  
**Attachments:** Animal Welfare proposed regulations feedback submission form1.docx

Sarah Abelson  
s 9(2)(a)

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Sarah Abelson

s 9(2)(a)

My feedback:

62. The proposed regulation states: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

Must only be performed for therapeutic reasons

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

I am a member of the New Zealand Kennel Club (NZKC) and am a registered breeder of pedigree dogs.

I am an accredited member of the New Zealand Council of Docked Breeds (NZCDB) and have had my animal husbandry skills signed off by a veterinarian, who must complete my application for accreditation by either witnessing neonate puppies being banded or being in the presence of another accredited bander to enable me to perform tail shortening.

The NZCDB as an organisation was established in 2004 and our membership is focussed on the welfare of tail shortened breeds. We operate as a fully audited and regulated group under the umbrella of the NZKC with the approval of the National Animal Welfare Advisory Committee (NAWAC).

I have never had a complaint or issue arise from any litter that I have completed banding on and to the best of my knowledge I understand that as an accredited group, we have performed tail shortening on over 10 500 neonate puppies without incident since 2005.

I am of the understanding that the procedure of tail banding (described by the NAWAC approved scheme) is vastly different from the process of tail amputation and as an accredited bander I only perform the tail banding procedure under the Animal Welfare Act (No2) 2015 and this is not a surgical procedure.

The breeds that I am associated with and that are banded by me are traditionally docked dogs that still perform their duties that they were designed for.

I understand that in 2012 NAWAC agreed and suggested a study should be completed to dispel any myths around the process of tail banding, yet to date, this has not been carried out by NAWAC so I am surprised that this proposal has taken shape.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

I understand that over 170 countries do not ban the tail shortening procedure however these countries are not spoken about in any documentation produced by MPI.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for tail shortening.

I am of the belief that there is currently a process in place for the SPCA to act on individual cases that perform a tail shortening procedure illegally on a litter of non-registered NZKC members neonate puppies, however in the last 4 years I only know of 2 cases where the SPCA has acted on this information.

61. The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

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

Hind limb dew claws: non-articulated (greater than or equal to four days of age)

Must be performed by a veterinarian or veterinary student under supervisions; and

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

When performing a dew claw removal, I complete this process in a neonate puppy 4 days of age or under. At this time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

No other country in the world has proposed this procedure should not be practiced as the health and welfare of the dog will be compromised.

As a professional dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and the dew claw if left on would result in significant pain and suffering to the dog.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for dew claw removal.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

In my profession as a Groomer/Boarding Kennel facility I have witnessed many incidents of dew claws growing back into the skin of the dog as the pet owner doesn't understand how to trim the nails and often as the dog is of a coated variety, they are not aware of a dew claw being present.

I understand that not all front dew claws are articulated and once again the breed specifics have been ignored in this instance and MPI have been advised incorrectly.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only – NZKC) have also not been included in the proposal to not allow this process to remain as is.

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✓ 569

**From:** Paula Clark s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 10:35 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare Submission

*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.*

*Yours faithfully*  
*Paula Clark*

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**From:** Ryan Mckenzie s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 10:14 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

I fully support our local dehorners Helen and Jorgan Hansen in the service they provide. We have never had an issue with there technique and have never lost a calf following dehorning in over 5 years and nearly 900 animals.  
Thanks Ryan Mckenzie

Sent from my iPhone

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Out of Scope

**From:** Out of Scope  
**Sent:** Tuesday, 17 May 2016 9:01 a.m.  
**To:** Ministerials; Animal Welfare Submissions  
**Subject:** FW: Submission on proposed tail docking & dew claw removal ban

Hiya – please treat as a submission.

Ministerials – to log as an info only ministerial.

Cheers!

Out of Scope

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**From:** Out of Scope  
**Sent:** Tuesday, 17 May 2016 9:00 a.m.  
**To:** s 9(2)(a)  
**Subject:** RE: Submission on proposed tail docking & dew claw removal ban

Dear Tim Julou

On behalf of Hon Nathan Guy, Minister for Primary Industries, thank you for your email regarding your submission on the proposed animal welfare regulations. I have forwarded your submission to the Ministry for Primary Industries so that it can be considered. I have also placed your email before the Minister for his information.

Yours sincerely

Out of Scope | Private Secretary for Biosecurity and Animal Welfare  
Office of Hon Nathan Guy  
Minister for Primary Industries  
5.3R Executive Wing | Parliament Buildings | Wellington | New Zealand

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**From:** Tim Equine Shoot s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 6:57 a.m.  
**To:** A Tolley (MIN)  
**Cc:** [nathan.guy@national.org.nz](mailto:nathan.guy@national.org.nz); Tepuke MPS  
**Subject:** Submission on proposed tail docking & dew claw removal ban

To: Hon Anne Tolley  
Hon Nathan Guy  
Hon Todd McClay

From: Tim Julou

s 9(2)(a)

14<sup>th</sup> May 2016

Submission on the Animal Welfare Act Review

Dear Sir/Madam,

I wish to express my opposition to the proposed tail docking and dew claw removal ban, under the Animal Welfare Act review.

I am deeply concerned that, having only just heard about this proposal myself, many affected people may miss the opportunity to submit their views.

I am a professional gamekeeper with over twenty years of experience in both NZ and Europe, currently operating in the Bay of Plenty region. I have a team of working dogs of various breeds, which enable me to do my job effectively.

My way of life involves long hours, usually alone, and the bond that develops with my team of dogs is difficult to describe to somebody who does not work with animals. There is pride at having trained them myself and seeing them go about the work they were bred to do; there is genuine affection and respect from countless hours spent together in the field.

I am grossly offended at the suggestion that the practise of tail shortening and/or dew-claw removal is inhumane.

I have first-hand experience of a working dog with a full length tail.

When last practicing in the United Kingdom, the subject of tail docking was then under review. This coincided with me taking on a new Springer Spaniel puppy, and so I decided to keep an open mind and try one with a full tail. By the age of two years, the tail was permanently damaged. She was unable to work and in constant pain. My options were to retire her (an unhappy situation for a dog that is bred to work) or have the tail surgically shortened.

I chose the latter. This is a surprisingly complex operation on an adult dog under full anaesthetic; it is very expensive and of course, most distressing for the poor dog. All in the name of 'animal welfare'. A classic example of well-meaning legislation doing more harm than good.

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In summary:

- Anybody who has witnessed tail docking of three-day old pups would agree that any pain experienced, if at all, is over in seconds. They continue about their business as normal, almost immediately.
- It is accepted practice to dock or alter all sorts of domestic animals for reasons of health or welfare management (pigs, cattle, lambs etc.). Why are dogs somehow different?
- A dog that has *never* owned a full length tail does not miss it and continues with life as normal.
- A dog that has *lost* its tail due to damage and misguided legislation is often very distressed and struggles to adapt.
- There is no 'natural state' for any domestic canine. All breeds are the result of human intervention over millennia, bred for their various attributes to serve man in myriad roles, as they still do today. I would venture to say that my spaniels are significantly better off in their daily work, hunting game as they were bred and trained to do, than a Queen's Street dwelling poodle, coat died pink and carried in a diamond-studded hand-bag. By comparison, which dog do you think is happier?
- A logical concession is to allow docking/dew claw removal on working breeds, carried out by registered veterinary practice.

I would like to extend an open invite to anybody involved in this proposal, to view my dog team in their home environment, going about their daily duties. A happier pack of hounds you will never find!

Kind Regards

Tim Julou

Gamekeeper, Equine Estate

*Equine Estate Ltd*

Tim (Gamekeeper)

s 9(2)(a)





**From:** m deery s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 8:59 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Docking tails  
**Attachments:** Matt MPI.pdf

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Your name:     Matt Deery    

Your contact de

TAIL DOCKING - I agree tail docking should be done by a vet but the quality assurance scheme under the Dogs Code of Welfare 2010 should remain to allow banding of tails on puppies under 4 days old, by accredited banders. The MPI regulations are attempting to prohibit an already approved ~~to~~ procedure and this is unreasonable and a case of MPI going beyond their regulatory power.

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.

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.

**From:** Richard Daniell s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 8:48 a.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 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.*

Kind regards

Richard Daniell

s 9(2)(a)



**From:** Martin, Jessica s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 8:43 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission for reviewing regulations around the use of animals

*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.*

*We should put the suffering of these sentient beings above profits of farmers.*

*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.*

Kind Regards  
Jessica Martin  
s 9(2)(a)

s 9(2)(a)



**From:** adeery@xtra § 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 8:26 a.m.  
**To:** Animal Welfare Submissions  
**Cc:** § 9(2)(a)  
**Subject:** Animal welfare proposed regulations feedback submission  
**Attachments:** Anne MPI.pdf

Hi  
Attached is my submission on the above  
Regards  
Anne Deery

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**Animal welfare proposed regulations feedback submission form**

Your name: Anne Deery

Your organisation (if applicable): \_\_\_\_\_

Your contact details: § 9(2)(a)

Your feedback: ① Dew claw Removal : I do NOT support the proposed regulations. Dew claw removal should still be able to be carried out, but I agree it should be carried out by a vet or by an accredited person under a Quality Assurance scheme. Dew claw removal should be allowed to be carried out on puppies 4 days old or younger by an accredited person, as this is the least traumatic time and involves minimal pain & distress. Performed correctly, there is no cutting through bone. Prohibiting the removal of dew claws (unless for therapeutic reasons) will be very difficult to enforce.

② Tail Docking - I agree this should be done by a vet, but the quality assurance scheme under the Dog Code of Welfare 2010 should remain to allow banding of tails on puppies under 4 days of age by Accredited Banders. The MPI regulations are attempting to prohibit an already approved procedure and this is unreasonable and a case of MPI going beyond their regulatory power.

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](mailto:animal.welfaresubmissions@mpi.govt.nz)

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**From:** George Craddock § 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 8:22 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

The proposed restriction to allow use electrical prodders on cattle over 100 Kg weight is too low, at that weight they are still only 6-9 month old young calves. That weight/size/age minimum should be 200 Kg (live weight) at least, then they are no longer in their first year as calves. It is the stock movers who excessively use the electric prodders to get the stock on and off the trucks quickly, the use is not necessary and may save the driver 1-2 minutes at the most.

Regards George Craddock  
Dry stock beef farmer, raising 4 day old to 2 year old beef cattle.

--  
Regards George

§ 9(2)(a)

✓ 577

**From:** Natalie Jane <s 9(2)(a)>  
**Sent:** Tuesday, 17 May 2016 8:14 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** My submission for Animal Welfare.

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. These animals suffer on a daily basis as they are not able to express their natural behavior – it is a cruel existence for them and it needs to change. 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.

Yours sincerely,

Natalie Jane.

Natalie Jane  
s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

[facebook](#) | [pinterest](#) | [linkedin](#)



**From:** Stéphanie Brosseau § 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 7:48 a.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 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.*

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*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.*

*Thank you.*

*Kind regards,  
Stéphanie Brosseau*

✓ 580

**From:** Sue Chaytor s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 7:29 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** submission for the current Animal welfare act  
**Attachments:** Animal Welfare proposed regulations feedback submission form.docx

hi  
please find attached my submission.  
regards

--  
*Sue Chaytor*

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Animal Welfare proposed regulations feedback submission form

Sue Chaytor

s 9(2)(a)

My feedback:

62. The proposed regulation states: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

Must only be performed for therapeutic reasons

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

I am a member of the New Zealand Kennel Club (NZKC) and am a registered breeder of pedigree dogs.

The NZCDB as an organisation was established in 2004 and the membership is focussed on the welfare of tail shortened breeds. They operate as a fully audited and regulated group under the umbrella of the NZKC with the approval of the National Animal Welfare Advisory Committee (NAWAC).

I have never heard of a complaint or issue arise from any litter that has completed banding on and to the best of my knowledge I understand that as an accredited group, they have performed tail shortening on over 10 500 neonate puppies without incident since 2005.

I am of the understanding that the procedure of tail banding (described by the NAWAC approved scheme) is vastly different from the process of tail amputation and any accredited bander can perform the tail banding procedure under the Animal Welfare Act (No2) 2015 and this is not a surgical procedure.

The breeds that I am associated with and train that are banded by any NZCDB member are traditionally docked dogs that still perform their duties that they were designed for.

I understand that in 2012 NAWAC agreed and suggested a study should be completed to dispel any myths around the process of tail banding, yet to date, this has not been carried out by NAWAC so I am surprised that this proposal has taken shape.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

I understand that over 170 countries do not ban the tail shortening procedure however these countries are not spoken about in any documentation produced by MPI.

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I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for tail shortening.

I am of the belief that there is currently a process in place for the SPCA to act on individual cases that perform a tail shortening procedure illegally on a litter of non-registered NZKC members neonate puppies, however in the last 4 years I only have heard of 2 cases where the SPCA has acted on this information.

61. The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

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

Hind limb dew claws: non-articulated (greater than or equal to four days of age)

Must be performed by a veterinarian or veterinary student under supervisions; and

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

When performing a dew claw removal, I complete this process in a neonate puppy 4 days of age or under. At this time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

No other country in the world has proposed this procedure should not be practiced as the health and welfare of the dog will be compromised.

As a professional dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and the dew claw if left on would result in significant pain and suffering to the dog.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for dew claw removal.



I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

In my area of expertise [dog training] I have witnessed many incidents of dew claws growing back into the skin of the dog as the pet owner doesn't understand how to trim the nails and often as the dog is of a coated variety, they are not aware of a dew claw being present.

I understand that not all front dew claws are articulated and once again the breed specifics have been ignored in this instance and MPI have been advised incorrectly.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only – NZKC) have also not been included in the proposal to not allow this process to remain as is.

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✓ 581

**From:** Tammy Fenske s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 3:00 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Factory Farming and Rodeo Animals

Do a proper review of factory farming!!!

While you're at it, ban rodeo and exotic animals in circuses, too!!!!

Do the Right Thing!!!

Tammy Fenske

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**From:** s 9(2)(a) on behalf of Annie Southern  
s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 1:45 a.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 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.*

**From:** s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 12:04 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal welfare proposed feedback submission  
**Attachments:** CCE16052016.pdf

Denise Smith  
Ebondobe Dobermanns  
" Where Quality is not Achieved by Chance"

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982



Animal Welfare proposed regulations feedback submission form

Denise Smith

s 9(2)(a)

My feedback:

62. The proposed regulation states: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

Must only be performed for therapeutic reasons

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

I am a member of the New Zealand Kennel Club (NZKC) and am a registered breeder of pedigree dogs.

I am an accredited member of the New Zealand Council of Docked Breeds (NZCDB) and have had my animal husbandry skills signed off by a veterinarian, who must complete my application for accreditation by either witnessing neonate puppies being banded or being in the presence of another accredited bander to enable me to perform tail shortening.

The NZCDB as an organisation was established in 2004 and our membership is focussed on the welfare of tail shortened breeds. We operate as a fully audited and regulated group under the umbrella of the NZKC with the approval of the National Animal Welfare Advisory Committee (NAWAC).

I have never had a complaint or issue arise from any litter that I have completed banding on and to the best of my knowledge I understand that as an accredited group, we have performed tail shortening on over 10, 500 neonate puppies without incident since 2005.

I am of the understanding that the procedure of tail banding (described by the NAWAC approved scheme) is vastly different from the process of tail amputation and as an accredited bander I only perform the tail banding procedure under the Animal Welfare Act (No2) 2015 and this is not a surgical procedure.

The breeds that I am associated with and that are banded by me are traditionally docked dogs that still perform their duties that they were designed for.

I understand that in 2012 NAWAC agreed and suggested a study should be completed to dispel any myths around the process of tail banding, yet to date, this has not been carried out by NAWAC so I am surprised that this proposal has taken shape.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

I understand that over 170 countries do not ban the tail shortening procedure however these countries are not spoken about in any documentation produced by MPI.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for tail shortening.

I am of the belief that there is currently a process in place for the SPCA to act on individual cases that perform a tail shortening procedure illegally on a litter of non-registered NZKC members neonate puppies, however in the last 4 years I only know of 2 cases where the SPCA has acted on this information.

61. The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

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

Hind limb dew claws: non-articulated (greater than or equal to four days of age)

Must be performed by a veterinarian or veterinary student under supervisions; and

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

When performing a dew claw removal, I complete this process in a neonate puppy 4 days of age or under. At this time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

No other country in the world has proposed this procedure should not be practiced as the health and welfare of the dog will be compromised.

As a professional dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and the dew claw if left on would result in significant pain and suffering to the dog.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for dew claw removal.

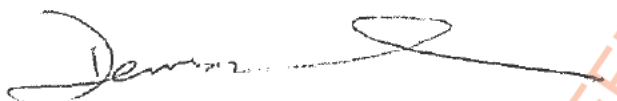
I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

In my profession as a Groomer/Boarding Kennel facility I have witnessed many incidents of dew claws growing back into the skin of the dog as the pet owner doesn't understand how to trim the nails and often as the dog is of a coated variety, they are not aware of a dew claw being present.

I understand that not all front dew claws are articulated and once again the breed specifics have been ignored in this instance and MPI have been advised incorrectly.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only – NZKC) have also not been included in the proposal to not allow this process to remain as is.

Yours Sincerely



Denise Smith  
Breeder and custodian of pure bred dogs since 1975

549

Out of Scope

**From:** Lynn Morrison-Bevan s 9(2)(a)  
**Sent:** Monday, 16 May 2016 11:53 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare proposed regulations feedback submission form

Please find below my feedback on The proposed Animal Welfare regulations

LYNN BEVAN

s 9(2)(a)

61. The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

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

Hind limb dew claws: non-articulated (greater than or equal to four days of age)

Must be performed by a veterinarian or veterinary student under supervisions; and

Pain relief must be used at the time of the procedure.

I DISAGREE with this proposal in its entirety and advocate for the status quo and these are my reasons:

I breed Black & Tan Coonhounds & Bassets. I have exported to Canada & America. I lived in Canada most of my life and we always removed dew claws due to deep snow and ice ripping them and making such a mess which would require surgery.

When pups are born, I have no idea as to which pups will be going overseas and therefore I remove the dewclaws from the entire litter, which is performed by a Veterinarian within 3 days of whelping. This saves the dogs from extreme pain, surgery and stress from accidental injury to them in later life.

The dew claws on a B&T Coonhound and are extremely large. Coonhounds love to snuggle and think they are lapdogs. The dewclaws can easily cause damage to exposed skin of anyone on the receiving end.

When performing a dew claw removal, I complete this process in a neonate puppy 4 days of age or under. At this time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

No other country in the world has proposed this procedure should not be practiced as the health and welfare of the dog will be compromised.



As a professional dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and the dew claw if left on would result in significant pain and suffering to the dog. See above

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for dew claw removal.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

In my profession as a Kennel facility I have witnessed many incidents of dew claws growing back into the skin of the dog as the pet owner doesn't understand how to trim the nails.

I understand that not all front dew claws are articulated and once again the breed specifics have been ignored in this instance and MPI have been advised incorrectly.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only – NZKC) have also not been included in the proposal to not allow this process to remain as is.

Kind Regards,  
Lynn Bevan  
Canoui Kennels, Home of the Bassets and B&T Coonhounds

✓ 585

Out of Scope

**From:** John Thompson s 9(2)(a)  
**Sent:** Monday, 16 May 2016 11:41 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 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.

Kind regards  
Gretchen Hart

s 9(2)(a)

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**From:** s 9(2)(a)  
**Sent:** Monday, 16 May 2016 11:14 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** This is my 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 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.

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!

Finally, I submit that substantially harsher penalties be applied to those convicted of animal cruelty.

Yours sincerely T.MWano



✓ 587

**From:** Jorgen Hansen s 9(2)(a)  
**Sent:** Monday, 16 May 2016 10:46 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** SUBMISSION ON ANIMAL WELFARE REGULATIONS .

LOCAL ANAESTHETIC : OUR CONCERNS .

WE believe it will be very difficult to manage this on site . Beef and Lamb New Zealand , say in their article that they "will want to ensure that any requirements are practical and reasonable when applied to New Zealands welfare friendly , extensive sheep and beef farming systems."

This is the main issue for us as many of the farms we disbud at , do not have the facilities to handle and inject the numbers of calves we do safely and calmly .

- \* the head will have to be secure .
- \* too easy to jab the bone , causing infection and pain , risk of jabbing eye area or ourselves .
- \* calves will have to be marked when done .
- \* it is more painful to be jabbed than to be disbudded by our method .
- \* I do many calves run in off the paddock dry enough to disbud but not to inject .

The hot cauterization method we use instantly numbs the nerves and seals off the blood supply .

Stress tests done in Denmark when first testing this method showed increased heart rate at time of injection , while calves not injected

showed very little increase in heart rate when disbudded .

We and our clients do not believe pain relief will benefit calves disbudded by our method .

The calves in our video submission were a week or two older than optimum age .

This method is not recommended for calves over 6 weeks old , as by then most horns are too big .

From Jorgen & Helen Hansen . s 9(2)(a)

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982



**From:** Jorgen Hansen s 9(2)(a)  
**Sent:** Monday, 9 May 2016 7:53 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Fwd: Submission on animal welfare regulations

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

It was forgotten to mention under advantages over conventional disbudding , that the procedure only takes approx 5 sec per horn .

----- Forwarded message -----

**From:** s 9(2)(a)  
**Date:** Sun, May 8, 2016 at 9:56 PM  
**Subject:** Submission on animal welfare regulations  
**To:** s 9(2)(a)

My name is Jorgen Hansen and I come from Denmark. I come from a dairying background and am qualified through Agricultural College in Denmark as a farm manager, which entitles me to buy farmland there.

I came to New Zealand in 1980 and have continued to farm here as a 50/50 sharemilker, eventually selling our cows to buy our own sheep farm, which we owned for 20 years.

I began our disbudding service in August 1991. For the last 20 years I have disbudded on average 34,000 calves per year, servicing about 170 farms over Southland, West and South Otago.

I use a Danish designed flat head cauterizing iron and was trained by one of the vets who designed the irons and developed this method of disbudding.

Because of the farmer demand for this method I have trained four other operators. Two have gone on to full time farming and the remaining two (named below) continue to offer separate disbudding services. Between them they disbud approximately 34,000 calves per year on about 180 farms in addition to what I do. They are:

s 9(2)(a)

s 9(2)(a)

We, as well as our clients, are very concerned that the new proposals for disbudding calves will effectively stop this method being used. Advantages over conventional disbudding include, but are not restricted to;

\* These irons do only a surface burn, they do not break through the skin. Blood vessels supplying the horn are cauterized so the horn cannot grow, leaving a scab that will drop off in a few weeks.

\* Calves remain in their own environment, food is not withheld, so that after being disbudded they are in a familiar place and settle very quickly.

\* We do not use a crush. Calves are laid gently on the ground on their side, held tightly between our legs.

\* So little stress, calves remain calm. Calves get up immediately after being disbudded and most times are seen playing around and feeding in a short time.

\* Optimum age for disbudding is 4 - 30 days old.

\* The burn site is completely sterilized by cauterization and there are no infections.

Many of our clients have had calves disbudded by young vets or operators with little practical experience in the correct handling of calves or the correct use of methods of disbudding. In fact, many of our clients have come to us as a direct result of these bad experiences. Irons are often used at too low a temperature, which prolongs the procedure and does not seal the wound. When the calves wake up, their blood pressure rises to normal, causing the unsealed wound to bleed, raising the risk of infection.

We believe that any method that breaks through the skin or goes even deeper into the head is totally unnecessary and cruel, causing great pain, trauma and a slow recovery, often with ongoing infections. We would like to see these inhumane methods completely banned.

While we are pro animal welfare and are pleased so many issues are being looked at, we feel a blanket approach does not allow for the good and best methods to continue. We - and our clients - do not believe pain relief is essential for our method. It will cause the calves to undergo an extra procedure and the stress it will cause with the double handling will only unsettle them for disbudding.

We hope that our method will be looked at properly and fairly and preferably not by biased vets. We hope to be able to continue to offer this clearly superior, humane method of calf disbudding to our clients. We have young men keen to train and carry on this disbudding procedure and are willing to train others across the country.

Most farmers and certainly our clients are very conscious of the welfare of their animals and are very fussy about who is allowed to handle their stock, especially their calves. They are very concerned that a proposal to make disbudding a vet only procedure effectively takes the control for animal welfare on their farms away from the many farmers who choose not to put their calves through the unnecessary suffering of other methods. There is also great concern that vets will not be able to cope with the high numbers of calves, causing them to be disbudded at a later age, causing more problems.

As our clients are already booked in for this season which begins in July, we all want to know what the plans are for this season, so we can plan and prepare. If pain relief becomes law, who will be able to administer it? The practical issues of working this out on site are huge - with or without a vet.

On Friday 13th May we will be disbudding autumn calves on a property near Winton. The farm owner is happy to invite anyone to come and watch, film and talk about the procedure. If interested please contact Jorgen Hansen by 11th May for more information.

Jorgen & Helen Hansen

s 9(2)(a)

753

**From:** s 9(2)(a)  
**Sent:** Saturday, 14 May 2016 9:33 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Fwd: Submission on animal welfare regulations

----- Forwarded message -----

**From:** Jorgen Hansen s 9(2)(a)  
**Date:** Mon, May 9, 2016 at 7:52 AM  
**Subject:** Fwd: Submission on animal welfare regulations  
**To:** [animal.welfaresubmissions@mpi.govt.nz](mailto:animal.welfaresubmissions@mpi.govt.nz)

It was forgotten to mention under advantages over conventional disbudding, that the procedure only takes approx 5 sec per horn.

----- Forwarded message -----

**From:** s 9(2)(a)  
**Date:** Sun, May 8, 2016 at 9:56 PM  
**Subject:** Submission on animal welfare regulations  
**To:** s 9(2)(a)

My name is Jorgen Hansen and I come from Denmark. I come from a dairying background and am qualified through Agricultural College in Denmark as a farm manager, which entitles me to buy farmland there.

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I use a Danish designed flat head cauterizing iron and was trained by one of the vets who designed the irons and developed this method of disbudding.

Because of the farmer demand for this method I have trained four other operators. Two have gone on to full time farming and the remaining two (named below) continue to offer separate disbudding services. Between them they disbud approximately 34,000 calves per year on about 180 farms in addition to what I do. They are:

s 9(2)(a)

[Redacted]

[Redacted]

[Redacted]

s 9(2)(a)

[Redacted]

[Redacted]

[Redacted]

We, as well as our clients, are very concerned that the new proposals for disbudding calves will effectively stop this method being used. Advantages over conventional disbudding include, but are not restricted to;

\* These irons do only a surface burn, they do not break through the skin. Blood vessels supplying the horn are cauterized so the horn cannot grow, leaving a scab that will drop off in a few weeks.



\* Calves remain in their own environment, food is not withheld, so that after being disbudded they are in a familiar place and settle very quickly.

\* We do not use a crush. Calves are laid gently on the ground on their side, held tightly between our legs.

\* So little stress, calves remain calm. Calves get up immediately after being disbudded and most times are seen playing around and feeding in a short time.

\* Optimum age for disbudding is 4 - 30 days old.

\* The burn site is completely sterilized by cauterization and there are no infections.

Many of our clients have had calves disbudded by young vets or operators with little practical experience in the correct handling of calves or the correct use of methods of disbudding. In fact, many of our clients have come to us as a direct result of these bad experiences. Irons are often used at too low a temperature, which prolongs the procedure and does not seal the wound. When the calves wake up, their blood pressure rises to normal, causing the unsealed wound to bleed, raising the risk of infection.

We believe that any method that breaks through the skin or goes even deeper into the head is totally unnecessary and cruel, causing great pain, trauma and a slow recovery, often with ongoing infections. We would like to see these inhumane methods completely banned.

While we are pro animal welfare and are pleased so many issues are being looked at, we feel a blanket approach does not allow for the good and best methods to continue. We - and our clients - do not believe pain relief is essential for our method. It will cause the calves to undergo an extra procedure and the stress it will cause with the double handling will only unsettle them for disbudding.

We hope that our method will be looked at properly and fairly and preferably not by biased vets. We hope to be able to continue to offer this clearly superior, humane method of calf disbudding to our clients. We have young men keen to train and carry on this disbudding procedure and are willing to train others across the country.

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As our clients are already booked in for this season which begins in July, we all want to know what the plans are for this season, so we can plan and prepare. If pain relief becomes law, who will be able to administer it? The practical issues of working this out on site are huge - with or without a vet.

On Friday 13th May we will be disbudding autumn calves on a property near Winton. The farm owner is happy to invite anyone to come and watch, film and talk about the procedure. If interested please contact Jorgen Hansen by 11th May for more information.

Jorgen & Helen Hansen

s 9(2)(a)



753

Out of Scope

**From:** Jorgen Hansen s 9(2)(a)  
**Sent:** Sunday, 15 May 2016 6:38 p.m.  
**Subject:** Submissions on animal welfare regulations

## Submission on animal welfare regulations

 dehorning.mp4

My name is Jorgen Hansen and I come from Denmark. I come from a dairying background and am qualified through Agricultural College in Denmark as a farm manager, which entitles me to buy farmland there.

I came to New Zealand in 1980 and have continued to farm here as a 50/50 sharemilker, eventually selling our cows to buy our own sheep farm, which we owned for 20 years.

I began our disbudding service in August 1991. For the last 20 years I have disbudded on average 34,000 calves per year, servicing about 170 farms over Southland, West and South Otago.

I use a Danish designed flat head cauterizing iron and was trained by one of the vets who designed the irons and developed this method of disbudding.

Because of the farmer demand for this method I have trained four other operators. Two have gone on to full time farming and the remaining two (named below) continue to offer separate disbudding services. Between them they disbud approximately 34,000 calves per year on about 180 farms in addition to what I do. They are:

s 9(2)(a)

s 9(2)(a)

We, as well as our clients, are very concerned that the new proposals for disbudding calves will effectively stop this method being used. Advantages over conventional disbudding include, but are not restricted to;

- \* These irons do only a surface burn, they do not break through the skin. Blood vessels supplying the horn are cauterized so the horn cannot grow, leaving a scab that will drop off in a few weeks.
- \* Calves remain in their own environment, food is not withheld, so that after being disbudded they are in a familiar place and settle very quickly.
- \* It only takes approx 5 seconds for each horn , stress to the calf is minimal .
- \* We do not use a crush. Calves are laid gently on the ground on their side, held tightly between our legs.
- \* So little stress, calves remain calm. Calves get up immediately after being disbudded and most times are seen playing around and feeding in a short time.
- \* Optimum age for disbudding is 4 - 30 days old.

\* The burn site is completely sterilized by cauterization and there are no infections.

Many of our clients have had calves disbudded by young vets or operators with little practical experience in the correct handling of calves or the correct use of methods of disbudding. In fact, many of our clients have come to us as a direct result of these bad experiences. Irons are often used at too low a temperature, which prolongs the procedure and does not seal the wound. When the calves wake up, their blood pressure rises to normal, causing the unsealed wound to bleed, raising the risk of infection.

We believe that any method that breaks through the skin or goes even deeper into the head is totally unnecessary and cruel, causing great pain, trauma and a slow recovery, often with ongoing infections. We would like to see these inhumane methods completely banned.

While we are pro animal welfare and are pleased so many issues are being looked at, we feel a blanket approach does not allow for the good and best methods to continue. We - and our clients - do not believe pain relief is essential for our method. It will cause the calves to undergo an extra procedure and the stress it will cause with the double handling will only unsettle them for disbudding.

We hope that our method will be looked at properly and fairly and preferably not by biased vets. We hope to be able to continue to offer this clearly superior, humane method of calf disbudding to our clients. We have young men keen to train and carry on this disbudding procedure and are willing to train others across the country.

Most farmers and certainly our clients are very conscious of the welfare of their animals and are very fussy about who is allowed to handle their stock, especially their calves. They are very concerned that a proposal to make disbudding a vet only procedure effectively takes the control for animal welfare on their farms away from the many farmers who choose not to put their calves through the unnecessary suffering of other methods. There is also great concern that vets will not be able to cope with the high numbers of calves, causing them to be disbudded at a later age, causing more problems.

As our clients are already booked in for this season which begins in July, we all want to know what the plans are for this season, so we can plan and prepare. If pain relief becomes law, who will be able to administer it? The practical issues of working this out on site are huge - with or without a vet.

On Friday 13th May we will be disbudding autumn calves on a property near Winton. The farm owner is happy to invite anyone to come and watch, film and talk about the procedure. If interested please contact Jorgen Hansen by 11th May for more information.

Jorgen & Helen Hansen

s 9(2)(a)

# Submissions on Animal Welfare Regulations.

from Jorgen & Helen Hansen  
5 Ballantrae Place  
Gore 9710.

8 May 2016

email me at

We are forwarding this article as an addition to our email submission regarding new calf disbudding proposals.

In those days we were very fortunate to have the approval and endorsement of a very well known and respected vet, who put a lot of business our way, preferring to "concentrate on being a vet, not a dehorner." - his words.

We hope you find the article informative. Peter O'Hara's response was very encouraging to us, and has allowed us to continue to offer our service all these years without undue hindrance.

We no longer import our irons from Denmark since they franchised the production of them to China, and they were very inferior and we could not use them. We now import from Australia, through Mico Wakefield Dunedin, the rods from which our friends Garry & Matthew Coats - fellow disbudders - make the irons.

Yours Sincerely  
Jorgen & Helen Hansen.



From Torgert Helen Hansen.

We are sending the original copy of our email to you incase we made a computer mistake in sending the email. We are new to computer technology and wanted to make sure you have our submission.

On Friday we have someone available to video the disbudding with farmer permission and they will email it to you with a link to U-Tube, ~~etc~~.



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# Submission on animal welfare regulations -

s 9(2)(a)

Inbox x

s 9(2)(a)

9:56 PM (8 hours ago)

to me

My name is Jorgen Hansen and I come from Denmark. I come from a dairying background and am qualified through Agricultural College in Denmark as a farm manager, which entitles me to buy farmland there.

I came to New Zealand in 1980 and have continued to farm here as a 50/50 sharemilker, eventually selling our cows to buy our own sheep farm, which we owned for 20 years.

I began our disbudding service in August 1991. For the last 20 years I have disbudded on average 34,000 calves per year, servicing about 170 farms over Southland, West and South Otago.

I use a Danish designed flat head cauterizing iron and was trained by one of the vets who designed the irons and developed this method of disbudding.

Because of the farmer demand for this method I have trained four other operators. Two have gone on to full time farming and the remaining two (named below) continue to offer separate disbudding services. Between them they disbud approximately 34,000 calves per year on about 180 farms in addition to what I do. They are:

s 9(2)(a)

s 9(2)(a)

We, as well as our clients, are very concerned that the new proposals for disbudding calves will effectively stop this method being used. Advantages over conventional disbudding include, but are not restricted to;

- \* These irons do only a surface burn, they do not break through the skin. Blood vessels supplying the horn are cauterized so the horn cannot grow, leaving a scab that will drop off in a few weeks.
- \* The procedure only takes 5 secs per horn.
- \* Calves remain in their own environment, food is not withheld, so that after being disbudded they are in a familiar place and settle very quickly.
- \* We do not use a crush. Calves are laid gently on the ground on their side, held tightly between our legs.
- \* So little stress, calves remain calm. Calves get up immediately after being disbudded and most times are seen playing around and feeding in a short time.
- \* Optimum age for disbudding is 4 - 30 days old.
- \* The burn site is completely sterilized by cauterization and there are no infections.

Many of our clients have had calves disbudded by young vets or operators with little practical experience in the correct handling of calves or the correct use of methods of disbudding. In fact, many of our clients have come to us as a direct result of these bad experiences. Irons are often used at too low a temperature, which prolongs the procedure and does not seal the wound. When the calves wake up, their blood pressure rises to normal, causing the unsealed wound to bleed, raising the risk of infection.

We believe that any method that breaks through the skin or goes even deeper into the head is totally unnecessary and cruel, causing great pain, trauma and a slow recovery, often with ongoing infections. We would like to see these inhumane methods completely banned.

While we are pro animal welfare and are pleased so many issues are being looked at, we feel a blanket approach does not allow for the good and best methods to continue. We - and our clients - do not believe pain relief is essential for our method. It will cause the calves to undergo an extra procedure and the stress it will cause with the double handling will only unsettle them for disbudding.

We hope that our method will be looked at properly and fairly and preferably not by biased vets. We hope to be able to continue to offer this clearly superior, humane method of calf disbudding to our clients. We have young men keen to train and carry on this disbudding procedure and are willing to train others across the country.

Most farmers and certainly our clients are very conscious of the welfare of their animals and are very fussy about who is allowed to handle their stock, especially their calves. They are very concerned that a proposal to make disbudding a vet only procedure effectively takes the control for animal welfare on their farms away from the many farmers who choose not to put their calves through the unnecessary suffering of other methods. There is also great concern that vets will not be able to cope with the high numbers of calves, causing them to be disbudded at a later age, causing more problems.

As our clients are already booked in for this season which begins in July, we all want to know what the plans are for this season, so we can plan and prepare. If pain relief becomes law, who will be able to administer it? The practical issues of working this out on site are huge - with or without a vet.

On Friday 13th May we will be disbudding autumn calves on a property near Winton. The farm owner is happy to invite anyone to come and watch, film and talk about the procedure. If interested please contact Jorgen Hansen by 11th May for more information.

Jorgen & Helen Hansen

s 9(2)(a)



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# MAF claps de-budders in irons

Jorgen Hansen de-buds more than 30,000 calves a year in Southland, using a technique he introduced from his native Denmark nearly 15 years ago. The technique - using flathead cauterising irons - was developed by a Danish vet in the early 1970s, and has been adopted by most vets there. But even though Hansen is working to full capacity each season, the Ministry of Agriculture & Forestry has never endorsed the technique. JO BAILEY reports.

"When I started, I talked to MAF about getting an import licence for the irons, and teaching other people the technique, but they were not interested," says Jorgen Hansen. "They didn't like the irons I was using, and believed I should be working on older calves, closer to weaning, which I think is far too late. While I am allowed to continue to practice, I can import the irons only for my own use."

He says the technique is much kinder than slow-burning methods, as it is very quick and relatively painless.

"It takes only three to five seconds per horn to de-bud the average calf, and they recover very quickly - they get up and shake their head a bit, and usually stand around watching me or start feeding soon after. Having been sent no distress signals, the other calves stand quietly, watching and waiting for their turn."

Four copper-headed irons are heated to very high temperatures inside a gas flame - unlike other techniques, which use gas-heated irons that are not put into the flame.

Hansen was trained in the de-budding technique by a vet in Denmark, and completed his theory at an agricultural college there. After arriving in New Zealand as an exchange student in 1977, he settled permanently in 1980, and was a 50/50 sharemilker between 1984 and 1991. He now runs a 200ha hill-country sheep farm at the top of Tuturau Hill, near Waikanae, where he lambed around 1700 ewes and ewe hoggets this season.

He works with a helper, Bruce Hamlin, and when necessary, relief helpers, whose job is to pass him the hottest iron, and keep the irons clean: "Having a reliable, experienced helper is critical to farmers' confidence, and my ability to do the numbers I do. We also operate very careful hygiene procedures between farms, as we go to many farms that have a closed-herd policy."

While his detractors may believe otherwise, Hansen maintains the key is working with very young calves - between four and 30 days of age: "While they are young, you end up with a nice flat head, and a very clean job. We rarely hear of infections, apart from the odd time a calf has scratched off the scab with a dirty hoof."

The older the calf, the bigger the horn, and the more heat you have to put on - with greater risk of infection if some of the horn is left behind, he says.

"It is important to know how the animal's brain works, and how much heat it can handle. It is vital that people using any type of irons are properly trained, as they can cook the brain and cause brain damage if they don't know what they are doing. I used the de-budding technique on my own calves, and, through word of mouth, the business started growing. In the ninth year, we reached the numbers we work on today."

Hansen and Hamlin are "flat out" during the season from August to October - often working 15-16 hour days. The work is physically demanding - a factor that has put others off the technique, says Hansen.

"I don't use the crush. I lie the calves down gently, then hold them for de-budding, which is much less stressful for them. I don't find it difficult - in the end it comes down to technique, just like shearing."

Ewen Miller, a veterinarian at Gore Vets, says the demand by local farmers for Hansen's technique "speaks for itself": "Farmers are obviously very pleased with Jorgen's technique. While not everyone can handle the physical demands, his method of restraint is very simple, which, I believe, causes less stress for

the calves than those that are mechanically restrained."

In some areas it has become common practice to sedate calves or use local anaesthetic at the site - a practice that's ultimately more time-consuming and costly for farmers. It is not necessary for him to anaesthetise the calves - something that can create more pain for the animal than the actual de-budding, says Hansen.

"It can take longer and be more painful to give the calf a jab than it does to put it through my technique. There are also some risks associated with knocking the calves out completely - unless you weigh every animal, how are you going to get the dose right? It is too easy to overdose."

National Animal Welfare Committee chairman Peter O'Hara says that while anaesthesia is not being recommended as a routine requirement at this stage, it is a recommended "best practice" and NAWAC believes this could become a requirement.

NAWAC has presented a Draft Animal Welfare (Painful Husbandry Procedures) Code of Welfare 2005 to agriculture minister Jim Anderton, relating to castration, dehorning/disbudding, and docking of farm animals.

"It is our intention to work with industry groups to come up with practical ways of providing relief for these painful procedures," says O'Hara. "We haven't put a timetable on when this might occur, but we believe that by the time the new code is reviewed in about five years, we will have made some progress."

He says he sees the merit in a very fast de-budding system, such as Hansen's.

"We look at which techniques provide the best net benefit in terms of animal welfare. If something can be done very quickly with short-lived pain and with less overall stress to the animal through reduced handling, it is something we will certainly look in to. We would compare that with disbudding using local or general anaesthesia."

The downside of providing pain relief, such as a local anaesthetic, is that it involves two handlings for the animal, and can create extra stress. And, as drugs are prescription only, they have to be administered by a vet, or under a vet's supervision - involving higher cost to the farmer.

Vet Ewen Miller says that if the market demands that such procedures are carried out with analgesia, there will be little choice but to comply.

"Until that happens, I believe Jorgen is using a very good method."

While he has more than enough calf-debudding work to keep him going, Hansen says that if enough farmers or vets were interested in the technique, he would take another look at the possibility of importing irons from Denmark and training people to use them.

Peter O'Hara says he sees the merits in a very fast de-budding system, such as Hansen's.



Jorgen Hansen: "It takes only three to five seconds per horn to de-bud the average calf, and they recover very quickly - they get up and shake their head a bit, and usually stand around watching me or start feeding soon after."

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ordinate activities. Further equipment was flown in by helicopter, and the spill was contained. The incident attracted the attention of the international media.

"Every job is different," says Roderique. "This one was unique as it was the biggest spill in New Zealand. We cleaned the wharves and had everything up and running as quickly as possible. The port re-opened within 52 hours."

He says the company's engineering shop is one of the most modern in Southland. The company's

maintenance and modification work in the general engineering, stainless-steel fabrication and sheetmetal work fields is done to clients' specifications. Staff will work around the clock if necessary.

Roderique says the firm is always seeking opportunities for growth and development. It also has curtainside trucks for general cartage, and Hiabs for discharging larger trawlers; it carries out MAF and survey inspections of containers, and does repairs; it also has a 1200sq m warehouse for storage.

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Geoff Hampton's general engineering experience in the mines of Australia and 15 years of general engineering practice in New Zealand have enabled him to develop his roller-mill technology and knowhow.

He has developed the roller mills in close collaboration with Canterbury farmers who use them - while continuing to run his general-engineering business from Southbridge.

"Our first principle of business practice is that we will repair anything that comes in the door," he says. Anything from fixing a handle on a shovel to constructing cricket nets and fabricating cowsheds - as long as it involves a metal-working problem.

The business has 10 full-time staff, and two trucks on the road, fitted out as self-contained workshops. The Southbridge district provides a diverse range of clients - market gardeners, arable farmers, dairy farmers, and those on dry-stock units.

Hampton qualified as a petrol mechanic before

### ■ DAVID PATERSON

heading to the Aussie mines. He says seven years in the engineering workshops of Western Australia mines laid down a good general skill base for rural engineering.

Having to deal with large-scale tasks in the mining industry led him to form strategies for making jobs more manageable. Perhaps the most essential quality he developed was getting things done with the time and resources at hand in the remote deserts of Western Australia.

In the last 11 years, he has expanded and diversified a general engineering business focused on machinery maintenance to include irrigation pumps, fabricating machinery for market gardeners, and the construction of roller mills for barley crushing.

"The key to building the roller mills is getting the grain to be flattened not crushed," he says. "We are now putting our roller mills into our showroom so that people can see the mills we've developed."

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598

**From:** Doyle Gary §  
**Sent:** Monday, 16 May 2016 10:38 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission

Part B. 12.61. Dogs. Dew claws

My family has been involved in the breeding and exhibition of pedigree dogs for over 40 years. During that time we have noticed that dogs with coat on the legs (eg Setters) have not been as prone to having problems with dew claws as much as those without coat (e.g. Greyhounds). The damage that a torn dew claw can cause to an animal that is unfortunate enough to tear one or both has to be seen to be experienced. In our experience a suitably qualified person such as an NZKC qualified Tail Docker is able to perform the removal without causing the animal any distress. We have always had our pups de-clawed at under 3 days of age and always just as they start feeding. The only noise made by the pups is their being removed from the teat. This is in direct contrast to what a local veterinarian wished to do. When our normal docked was unable to come to our house when drove to a vets surgery. Here we were told that the 3 day old pup would have stay overnight and the mother would not be allowed to stay. The pups would also be fully euthanised. This procedure would in our opinion and in the opinion of others most likely result in the death of several of the pups. So called trained persons actually have extremely limited knowledge when compared to a very experienced breeder. We are prepared to supply the name of the Surgery if required as well as the date of the visit. We have never experienced a distressed pup when the procedure is done correctly. We have however seen the result of what can happen when a front dew claw has not been removed and then as an adult had one ripped out, it is not an experience that I would wish any animal lover to witness. We strongly support that the right to have front dew claws removed by a suitably trained person who may be a veterinarian or another person recognised under the scheme as is accredited by the New Zealand Kennel Club, if the procedure is done without having the pups separated from its mother nor having to be euthanised.

Part B 62 Dogs . Tail docking

Here agin personal experience has shown that this procedure when carried out by persons accredited by the New Zealand Kennel Club to be quick and the pups show no distress, unlike the pain and distress shown by lambs and cattle, the latter two often being done when the animals are days and even weeks old as opposed to the dogs being done at under 3 days. To quote that a number of countries have banned the procedure does not necessarily show that it is correct. Done properly there is no evidence of pain or distress nor is there any evidence that breeds that have been traditional docked have adapted to the difference that a heavy tail will make to the spinal structure in the pelvic region, selective breeding of dogs over generations have allowed them to develop a slightly different skeletal structure which may with the leaving on of a tail cause health issues in the future.

Gary Doyle JP  
NZKC Life member  
NZKC All Breeds Judge  
NZKC Membership number § 9(2)(a)

✓ (589)

**From:** Kay King <s 9(2)(a)>  
**Sent:** Monday, 16 May 2016 10:29 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

Kay King

s 9(2)(a)

Dogs tail docking

I recommend keeping the current min standard 17. I have a docked breed and would strongly dispute that they cannot convey their feelings they can wag their tails, or clamp them down depending on how they are feeling at the time. There are also many other ways a dog shows it's feelings, eyes/head carriage/ body position/barking/ear set. My dogs are perfectly balanced without their tails, they can jump/walk/run and although my dogs don't get the opportunity to swim I have seen many photos of docked breeds swimming in rivers and at the beach. I have had two litters which were docked and front dew claws removed by an official approved NZKC tail docker and all the pups without exception showed no signs of pain or discomfort, there was no infection in any of the puppies. The NZKC docker also gave me invaluable advice on the care of my puppies, this advice from very experienced dog people would be lost if this section of the code was to change.



(590) ✓

**From:** Evelyn & John Welsh s 9(2)(a)  
**Sent:** Monday, 16 May 2016 10:03 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Fwd: One week to have your say!

Sent from my iPad

 Forward

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Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of this picture from the Internet.

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.





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✓ (591)

**From:** vanessa s 9(2)(a)  
**Sent:** Monday, 16 May 2016 9:54 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Urgent - must read

*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.*

Thank you,

Vanessa Vella

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**From:** Mareta Twentyman s 9(2)(a)  
**Sent:** Monday, 16 May 2016 9:52 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 would like you to conduct a full and thorough review of factory farming as a whole, including all of the animals trapped indoors in permanent confinement. We should not be regulating practices that breach New Zealand's own Animal Welfare Act, but should instead be looking to progress to banning 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.

In summary, it is unfortunate that so many antiquated practices continue to be legal in New Zealand, with insufficient regulation and welfare protection. Adoption of the above suggestions will go a long way in developing our country's status as clean and green, and progressing us towards a more civilised society. We need to implement short, mid and long-term plans that are actually going to create change and be achievable, in order to significantly improve the lives of these animals.

Please do not hesitate to contact me if you have any further questions.

Kind regards  
Mareta Twentyman

s 9(2)(a)

Sent from Outlook



**From:** Kathy and Peter s 9(2)(a)  
**Sent:** Monday, 16 May 2016 9:44 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

I am totally FOR the proposed Animal Welfare regulation changes.  
Thank you for your approval.

Kathryn A Konieczny

s 9(2)(a)

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**From:** Julie s 9(2)(a)  
**Sent:** Monday, 16 May 2016 9:35 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare submission

To the Ministry of Primary Industries,  
This is in addition to my submission on gat tethering and relates to more of 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. These practices are outdated and not fit for use in this day and age. 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. The suffering of animals for people's 'entertainment' is not acceptable.

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 as mentioned above, there is no reason to allow an animal to suffer for entertainment purposes.

Many thanks for your consideration.

Julie Inglis

Out of Scope

✓ 59S

**From:** s 9(2)(a)  
**Sent:** Monday, 16 May 2016 9:30 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare  
**Attachments:** Animal Welfare proposed regulations feedback submission form.docx

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## Animal Welfare proposed regulations feedback submission form

Lorelle Goodman

s 9(2)(a)

My feedback:

61. The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

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

Hind limb dew claws: non-articulated (greater than or equal to four days of age)

Must be performed by a veterinarian or veterinary student under supervisions; and

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

When performing a dew claw removal, I complete this process in a neonate puppy 4 days of age or under. At this time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

No other country in the world has proposed this procedure should not be practiced as the health and welfare of the dog will be compromised.

As a professional dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and the dew claw if left on would result in significant pain and suffering to the dog.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for dew claw removal.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.



In my profession as a Groomer/Breeder I have witnessed many incidents of dew claws growing back into the skin of the dog as the pet owner doesn't understand how to trim the nails and often as the dog is of a coated variety, they are not aware of a dew claw being present.

I understand that not all front dew claws are articulated and once again the breed specifics have been ignored in this instance and MPI have been advised incorrectly.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only – NZKC) have also not been included in the proposal to not allow this process to remain as is.

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✓ (S96)

**From:** nomes §  
**Sent:** Monday, 16 May 2016 9:19 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 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.*

*Thank you for taking the time to read this submission. This is the opportunity for New Zealand to lead the world in animal welfare standards!! Its time for cruel and inhumane factory farming to be banned. These animals have suffered enough, there has to be another way.*

*Thank you*

*Mr & Mrs Stuart & Tracey Nome*

1/597

**From:** Ross and Maria s 9(2)(a)  
**Sent:** Monday, 16 May 2016 8:48 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on animal welfare

Hello

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. In my view there is a double standard regarding NZ's Animal Welfare Act in that farmed animals can be kept in appalling conditions, but prosecutions would be brought if "pets" were kept in exactly the same conditions. MPI seems to bend over backwards to excuse the farmer, and there seems to be an incredibly high bar regarding animal abuse before any proceedings are brought against offenders. A recent case in point - the disgusting behaviour of Waikato farm workers towards bobby calves.

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.

Yours sincerely  
Maria van Montfort

**From:** jenny s 9(2)(a)  
**Sent:** Monday, 16 May 2016 8:28 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** submission on animal welfare

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.

Regards,  
Jenny van der Merwe



Out of Scope

**From:** Russell Berry s 9(2)(a)  
**Sent:** Wednesday, 18 May 2016 6:33 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** ANIMAL WELFARE  
**Attachments:** ANIMAL WELFARE ACT 1999 PROPOSAL SUBMISSION 28 SEPT 2012.docA.doc;  
Animal Welfare Strategy Sept 2012.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Green Category

Dear Sir/madam,

Please find the attached submissions regarding Live Honey Bees which were written some time ago but are still applicable today.

I assume that live honey bees are still considered to be insects and are not affected by Animal Welfare matters. If this is the case I do not need to make submissions.

But if live honey bees are considered to be animals, please read the attached submissions, supporting their exclusion from being defined as an animal for this Welfare Act and I would like the opportunity to make verbal submissions, because it would be absolutely devastating on the Beekeeping Industry and the producers of crops who rely on honey bees for pollination – if they were considered to be animals.

Russell Berry  
Director  
ARATAKI HONEY LTD

# SUBMISSION FORM

## **ANIMAL WELFARE MATTERS: Proposals for a New Zealand Animal Welfare Strategy and Amendments to the Animal Welfare Act 1999**

Please send your submission to the Ministry for Primary Industries by 5.00pm Friday 28 September 2012. Submissions can be emailed to [aws submission@mpi.govt.nz](mailto:aws submission@mpi.govt.nz) or posted to:

Animal Welfare Strategy and Legislation Review  
Ministry for Primary Industries  
PO Box 2526  
WELLINGTON 6140

The questions in this form should be treated as a guide only – you can choose to answer any or all of the questions, or provide any other comments.

The consultation document *Animal Welfare Matters* can be downloaded from the Ministry for Primary Industries website <http://www.mpi.govt.nz/news-resources/publications.aspx>

Submissions and a summary of submissions will be published on the Ministry's website. If you or your organisation do not want information in your submission to be published, please make this clear in your submission and explain why. The Ministry will take this into account when deciding whether to publish the submission or release it under the Official Information Act 1982.

### **Personal Information**

**Your name:** Russell Berry

**Your organisation/sector/interest group (if applicable):**

**Arataki Honey Ltd - Managing Director Rotorua Division**

**NZ Honey Bee Pollination Assn - President**

**National Beekeepers' Assn - Executive member**

**Exporter of Live Honey Bees**

### Issue 1: New Zealand animal welfare strategy

- Q1. Do you have any overall comments or feedback about the proposed strategy and its approach?
- Q2. What are the risks and benefits of adopting this strategy? Can you think of any missed opportunities or unintended consequences?
- Q3. Do the values reflect New Zealanders' views about animal welfare? Would you suggest something else and why?
- Q4. Do you have any comments on the proposed approaches, leadership roles, or Government priorities?

#### Answers and comments

The Animal Welfare Act does not include Insects except where they are added by Order in Council.

I request that Insects are not included by way of Order in Council into the Animal Welfare Act.

The proposed Strategy is not appropriate for Honey Bees, so please maintain the exclusion of Honey Bees from the Act.

If they were to be included, this could have a very serious consequence to successful beekeeping in New Zealand and a detrimental effect on the pollination of food crops.

### Issue 2: Standards for care and conduct towards animals

- Q5. Do you agree with the proposal to replace codes of welfare with a mix of directly enforceable standards and guidelines?
- Q6. What are the risks and benefits of this proposal? Can you think of any missed opportunities or unintended consequences?
- Q7. What impact will the proposed changes have on you and/or your organisation or sector?

#### Answers and comments

Q5. Enforceable standards generally create a 'them and us' situation which is not necessarily beneficial to animal welfare. Most New Zealanders are very concerned about animal welfare and this should be fostered.

Q6. If bees were included in the Act, unintended consequence could be the severe damage to the New Zealand Beekeeping Industry and the shortage of hives for the pollination of food crops

Q7. Bringing about a degree of uncertainty by being controlled by somebody else who knows little about beekeeping.

### Issue 3: Criteria for developing standards

- Q8. Would the proposals to add "practicality" and "economic impact" to the set of criteria improve the decision-making process, or would you suggest something else?
- Q9. Do you agree that having "transitions" and "exemptions" is a better way to handle the situations that currently fall under 'exceptional circumstances'?
- Q10. What are the risks and benefits of these proposals? Can you think of any missed opportunities or unintended consequences?
- Q11. What impact would the proposed changes have on you and/or your organisation or sector?

#### **Answers and comments**

- Q8. Practicality and economic impact would make sense providing it was driven by the beekeepers.
- Q9. We certainly approve of a complete exemption for beekeepers and honey bees.
- Q10. See attachment
- Q11. If honey bees were treated as Animals and were not exempt, we would live with the fear of being prosecuted constantly, with little ability to avoid prosecution because this Welfare document is not written with Honey Bees in mind

#### **Issue 4: Role of the National Animal Welfare Advisory Group**

- Q12. Do you agree there is still a role for an independent committee on animal welfare?
- Q13. Do you agree that the committee should be able to publish its advice at its discretion?
- Q14. Do you agree that the current membership of the committee is appropriate or does it need to be changed?

#### **Answers and comments**

- Q12.- 14. Any advice that keepers of animals can receive to voluntarily improve the welfare of their animals would be most welcome.

#### **Issue 5: Live animal exports**

- Q15. Do you agree with the proposal to create directly enforceable standards for the export of live animals?
- Q16. Do you agree with broadening the purpose of the exports part of the Act so that New Zealand's reputation can be considered when making rules or deciding on applications?
- Q17. What are the risks and benefits of these proposals? Can you think of any missed opportunities or unintended consequences?
- Q18. What impacts will the proposal have on you and/or your organisation or sector?

#### **Answers and comments**

- Q15. Not Honey Bees
- Q17. See attached
- Q18. If Honey Bees are included, by any means, in the Animal Welfare Act, it would have a very serious detrimental effect on beekeeping..

#### **Issue 6: Significant surgical procedures**

- Q19. Do you agree with the proposals to change who can perform significant surgical procedures under veterinary supervision?
- Q20. Do you agree that the Act should allow for mandatory conditions to be placed on controlled surgical procedures?
- Q21. What are the risks and benefits of these proposals? Can you think of any missed opportunities or unintended consequences?
- Q22. Are there any other ways the system should be improved?
- Q23. What impact would the proposed changes have on you and/or your organisation or sector?



If you have a view on any of the procedures described in section 4.7.5 of the consultation document, please indicate how you think they should be classified:

- Not significant: can be carried out by anyone.
- Significant: may only be carried out by a veterinarian or a person who is acting under the direct supervision of a veterinarian and who is being taught veterinary science at undergraduate level.
- Restricted: as for significant surgical procedures plus may only be carried out if the procedure is in the animal's interests and using appropriate pain relief.
- Controlled: as for significant surgical procedures plus may also be carried out by the owner of an animal, or their employee with written veterinary approval.
- Prohibited: no one may carry out the procedure.

#### Answers and comments

Q19 – 23 I am sure you had no intention of having Vets supervising the AI of queen bees and for the collection of semen, and the clipping of bees wings etc. I trust this is the case.

#### Issue 7: Reporting of animals killed for research, testing or teaching

- Q24. Do you agree that the number of animals killed humanely for research, testing and teaching should be included in official statistics?
- Q25. What impact, including costs, would the requirement to report animals killed for use in research, teaching, and testing have on you or your organisation?
- Q26. Can you think of any other changes that would improve the system for regulating animals used in research, testing and teaching?

#### Answers and comments

Q24. Not Honey Bees, it would be impossible to count them.

Q25. Very significant, as we send approx. 500 samples of 500 bees per sample = 250,000 bees to AsureQuality alone, for testing for Exotics. If you could count 1000 bees per hour that would take 250 hours @ \$100 per hour = \$25,000. I am sure AsureQuality would not want the job of counting them either and we have to kill a lot more bees to test for varroa mites and resistance to our treatments. So the cost would be getting close to \$50,000 per annum, just for our company for no benefit to the company.

#### Issue 8: Enforcement tools

- Q27. Do you agree with the proposals to attach instant fines to some minor offences and give some animal welfare inspectors the ability to issue compliance orders?
- Q28. What are the risks and benefits of this proposal? Can you think of any missed opportunities or unintended consequences?
- Q29. What impact would the proposal have on you and/or your organisation or sector?

#### Answers and comments

Q27. Instant fines are always dangerous. People can be unjustifiably singled out because they are not liked or for some other reason, e.g. the American Foul Brood Pest Management Strategy. Some beekeepers appear to have been singled out with no justification for major disease inspection exercises, when disease levels gave no justification for actions taken. You have to be extremely careful of this. It is better to educate than to prosecute.

### Issue 9: Other proposed offences

- Q30. Do you agree with the proposal to make drowning a land animal an offence?  
Q31. Do you agree with the proposal to clarify that wilful and reckless ill-treatment offences apply to animals in a wild state?  
Q32. What are the risks and benefits of these proposals? Can you think of any missed opportunities or unintended consequences?

#### Answers and comments

- Q30. Yes I agree it should be an offence for four legged animals and birds, but not for Insects (Honey Bees).  
Q31. Yes I agree, but not to Honey Bees or other Insects.

### Issue 10: Technical amendments

- Q33. Do you have any comments on any of the technical amendments proposed in Table 1?

#### Answers and comments

#### Any other comments

- Q34. Do you have any other comments or feedback not covered by these questions?

#### Answers and comments

##### Q34. See attached

Do not apply Animal Welfare to Honey Bees as it will stir up a hornets' nest.

Russell Berry 28 September 2012

Email to: [awsubmission@mpi.govt.nz](mailto:awsubmission@mpi.govt.nz)  
Animal Welfare Strategy and Legislation Review  
Ministry for Primary Industry  
Po Box 2526  
Wellington 6140

I wish to make a Submission on:

## **Animal welfare matters**

### **Proposals for a New Zealand Animal Welfare Strategy and Amendments to the Animal Welfare Act 1999**

#### **MPI Discussion Paper No 2012/07**

#### **And the proposal to amend the Animal Welfare Act 1999**

1. I understand the Animal Welfare Act does not include Insects except where they are added by Order in Council. I see no indication that this is going to be done. I request that Insects are not added by an Order in Council.
2. It appears that after reading the 33 pages of the MPI Discussion Paper No. 2012/07, it is not the intention to include Insects, because there is no mention of Insects in the proposals for a New Zealand Animal Welfare Strategy and the proposed Amendments to the Animal Welfare Act.
3. As much as Honey Bees are Insects I would assume that they are not included in the Proposals.
4. **If there are any thoughts of putting through an Order in Council to have Insects included in the Animal Welfare Act I would request that an exemption be made from these proposed Animal Welfare Matters, Regulations, Act, for Honey Bees.**
5. If you were to put through an Order in Council to include Insects and not exempt honey bees, it makes the situation completely different to what has been written in the Proposal. A few examples would be: (which could be illegal under the new proposed Act),
  - a. spraying of flies, because of the inhumane way of killing flies – the stress they are put under
  - b. knowingly squashing of live honey bees and other insects by driving over flowering crops e.g. clover
  - c. the burning of honey bees and other insects by electronic insect controllers, deliberately creating a nasty death for insects
  - d. the drowning of bees and other insects by spraying crops, particularly where surfactants are used. The sprayer knows he will kill bees if spraying during the day when flowers are present
  - e. making the American Foulbrood Pest Management Strategy illegal, because of the methods used for checking for AFB because of having to open live cells and the destruction methods used to destroy positive AFB hives.
  - f. checking of live honey bees for varroa mites and for resistance to the chemicals we are currently using, means deliberately killing bees
  - g. the deliberate killing of undesirable insects in crops, as well as desirable insects such as honey bees, by either dusting or spraying
  - h. the introduction into New Zealand, of parasites to kill other insects in inhumane ways
  - i. the treating of seed crops to poison insects later on, including bees

- j. deliberate allowing into New Zealand honey and bee products which will bring in undesirable, sometimes lethal new bee diseases causing undue suffering of our bees
- k. clipping of queen bees' wings for identification purposes and restricting flying of queens
- l. surgical procedures such as AI of queen bees
- m. forced male ejaculation and death of drone bees for the purpose of AI breeding programme to try to improve resistance to varroa
- n. the definition of 'manipulation' may be very hard to meet
- o. squashing of queens and queen cells to stop swarming
- p. squashing of drone brood in hives – or removing from the hive to control varroa
- q. deliberate exposure of any animal to any parasite, micro-organism, drug, chemical, biological product
- r. electrical stimulation for bee venom collection

I am not in a position to make well informed submissions on the welfare of Four Legged Animals, birds and fish etc. But I am in an extremely good position to make submissions on the welfare of live honey bees. I have been a beekeeper for 60 years, and with my brother Ian, operate the largest beekeeping operation in New Zealand, we do more pollination of crops than anyone else in NZ and we developed live bee exports from NZ and being one of the two major exporter of bees.

I trust commonsense does prevail and that honey bees are already excluded, but if not that you do exclude them.

If you are looking at the possibility of including them by an Order in Council or by any other means I would like the opportunity to make a far fuller submission than the above, including verbal submissions.

**Please make sure honey bees are excluded from a New Zealand Animal Welfare Strategy and any Animal Welfare Amended Act.**

**Russell Berry**

Arataki Honey Ltd

The New Zealand Honey Bee Pollination Assn

National Beekeepers' Association Executive member

Exporter of Live Honey Bees

For further information see our web site: [www.aratakihoneyrotorua.co.nz](http://www.aratakihoneyrotorua.co.nz)



✓ 600

**From:** Barbara Worrall s 9(2)(a)  
**Sent:** Monday, 16 May 2016 8:06 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 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.

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**From:** Michelle Androu s 9(2)(a)  
**Sent:** Thursday, 19 May 2016 10:14 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on proposed regulations for the export of live animals.

**Categories:** Green Category

From: Michelle Androu

s 9(2)(a)

18<sup>th</sup> May 2016

To the Ministry for Primary Industries,

a: Proposed regulations for the transport of live animals from NZ.

4.2. I oppose live animal exports from NZ for slaughter to any country and the following:

- Animals that are exported must only be approved to countries that have strict and enforceable animal welfare codes that are overseen and approved by a registered animal welfare organization (like SPCA NZ).
- Any livestock that is exported should be done in small numbers and with great care. Animals exported must be accompanied by vets from BOTH countries.
- The country or countries receiving animals must guarantee the safe passage, treatment and use of ALL animals imported.
- Animals exported must not be exported for scientific research, vivisection, genetic modification and/or cloning. The conditions of the animals should be recorded on film for the whole duration of transportation and be made available on request to interested parties, including the SPCA NZ.
- MPI needs to get wise to fraud in the area of other countries applying to NZ to import live animals. It has been documented that within China cows have been genetically engineered and cloned, all in the past 5 years. It is highly likely these cows came from NZ. It is not good enough to "wash our hands" regarding the fate regarding scientific research of our beautiful animals that are exported. This will and is NOW damaging New Zealand's reputation in the long term as GE is not at all popular globally when it comes to food production.
- The exposure of cruelty to animals, especially farmed animals, is going to increase exponentially due to social media. Whether MPI likes it or not there is only so much spin you can spin, the truth almost always comes out. In the MPI consultation document 2016/13; "New Zealand's "good animal welfare reputation"" is referred to many times over. This reputation is flimsy at best, as money and profit reign supreme in the farming industry (see my submission on bobby calf treatment). "Good reputation" needs a more sophisticated definition by looking at a bigger picture of the future of food production in this country.

Thank you for the opportunity to make a submission.

Yours sincerely

Michelle Androu

602

Out of Scope

**From:** s 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 12:31 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare

**Categories:** Green Category

Regarding live animal exports. I believe that there should not be any live animal exports at all. Whatever changes you make, the animals will still suffer and it is not necessary to export any animal alive.

E. Verry

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**From:** Graham Cliff s 9(2)(a)  
**Sent:** Monday, 16 May 2016 2:43 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Live animal export regulations

**Categories:** Green Category

I wish to make a submission regarding the proposed regulations for the shipment of live animals from New Zealand.

Name: Dr Graham Cliff

Status: Private citizen

s 9(2)(a)

I do not wish to attend to speak to this submission.

1. I oppose the export of any number, and of any species, of live animals from New Zealand, regardless of the intended, proposed, or suggested purpose thereof (subject to [4] below).
2. This position is predicated on the fact that once any animal has left this country, to enter the jurisdiction of another, the New Zealand government has no statutory say over the fate of that animal. Assurances given by exporters here, and/or foreign importers in the recipient country, cannot guarantee the humane treatment of such animals, whether for slaughter (which is not currently permitted) or for other purposes (such as breeding).
3. There are two reasons for this stance: (a) it is ethically incumbent on us, as a civilised society, to do whatever we can to ensure that animals do not suffer needlessly - even if by mischance or incompetence; (b) the reputation of New Zealand as a humane society depends on the absolute integrity of its treatment of animals; in the event of cruelty taking place at the recipient destination, the resultant publicity will still adversely affect New Zealand's international image, regardless of who may be culpable. The imposition of penalties after the fact, should the rules be breached, is unsatisfactory - it is both time-consuming and costly. Prevention is better than cure.
4. Under the most exceptional of circumstances, the Minister for Primary Industries should be able to sanction the export of live animals (for example, for zoological exchange programmes) but he or she should be required to give public notice of such an intention, and sufficient time for public representations, for or against such a proposal.



Graham Cliff

16 May 2016

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**From:** Debbie Laing <sup>s 9(2)(a)</sup>  
**Sent:** Monday, 16 May 2016 12:57 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** 'Submission on Animal Welfare Regulations'

**Categories:** Green Category

Dear MPI

This is my submission on the proposed law changes to the animal welfare regulations. In my opinion the regulations, nor the act they govern do enough to protect animals from harm, or from suffering.

I think the proposals for change are a minimum response to pretend the government is doing anything substantial to change our laws that allow wide scale animal suffering.

I call on the government to actually do a proper review of all aspects of factory farming in NZ, to ban live exports together, and to ban rodeo and exotic animals in circuses.

Farming practices in NZ are abysmal – saying they are among the best in the world is irrelevant if the way the animals are treated is still terrible! Our laws allow pigs to be kept in crates, and to be kept permanently inside on many farms so they not only can not express normal behaviour, they suffer distress and psychological damage. Our law allows chickens to live in over crowded conditions, both barns and cages where again, they are permanently inside, are unable to express their innate natural behaviour.

On dairy farms our law allows calves to be removed from their mothers at only a few hours old, and on some farms cows are aborted at term instead.

The weakness of our laws and the attitude of the government and too many of our farmers is that animals are nothing more than an economic unit that has no value as a sentient being. This attitude allows the mistreatment of thousands, millions of animals every year, from the way they are kept to the way they are handled, from the farm, to the transportation, to the slaughterhouse.

Until this government learns some compassion for animals, and grows some balls to stand up to the farmers and businesses who exploit animals, and actually give our laws some standards and teeth, animal suffering on farms in NZ will continue. I for one am sick of the situation, and the whitewash the government continually applies to it.

Live animal exports are simply an extension of the cruelty and suffering that is inflicted on animals in our farming industry, and should not be allowed to continue.

The use of animals, particularly exotic animals in circuses, and the cruel sport of rodeo is simply outdated and needs to be banned. People's attitudes are slow to change, and some people are simply uncaring about the suffering of animals, and so the leadership needs to come from the government before change takes place.

I urge this government to actually take a real stand for animal welfare in NZ and review the laws around factory farming. MPI can paint pretty pictures and skirt round the real issues about what happens on farms in NZ, and can fool lots of the population. But more and more people are waking up to the reality of what goes on behind closed doors, and it's time to make changes.

I ask this government; if the NZ public could go behind the doors of the chicken and pig farms do you think they'd still believe that our animal welfare laws are adequate? I think for most of the public, the answer would be no. Therefore, our laws should ensure that what goes on behind closed doors would stand up to public scrutiny.

Sincerely  
Debbie Laing

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**From:** diane warren s 9(2)(a)  
**Sent:** Saturday, 14 May 2016 8:25 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal welfare regulations  
**Categories:** Green Category

Dear sir/Madam

I am aware the government is reviewing animal welfare regulations. I hope this will result in humane practices and work to eradicate animal suffering.

I understand you will be looking at live animal exports, the care of and conduct towards animals, and surgical and painful procedures.

Live animal exports can not be managed once the animals arrive at their destination, and as shown by recent Austrian footage, mass numbers of these animals suffer excruciating and horrific deaths and treatment. I am completely against live animal exports. They have been banned in NZ since the previous fiascos and the government is now trying to sneak them in again.

I also feel you should be outlawing some of the cruel practices in NZ that you do not seem to be reviewing at all! In NZ chickens are kept in cruel battery cages and pigs in crates so small they cannot turn around.

**NZ people do not want practices that breach the Animal Welfare Act regulated, we want them BANNED!**

Kind regards  
Diane Warren



**From:** Angela Mills s 9(2)(a)  
**Sent:** Saturday, 14 May 2016 5:46 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission re Animal Welfare Review

**Categories:** Green Category

I would like to add my submission regarding the review of the Animal Welfare act.

Factory farming has no place in New Zealand. Our treatment of animals reflects on us as a society, and if any cruel practice is accepted as normal, gradually people are desensitised to any empathy they may have had regarding what is right or wrong in the treatment of animals. An animal that has legs has a natural need to use those legs for its own physical health, and it would be arrogant for humans to assume there is no mental anguish suffered by an animal which is confined.

I would also like to promote the protection of New Zealand when factory farming is abandoned, whereby the issue of animal welfare is so important to our country that we will not import meat from countries who do not follow the same animal welfare rules on factory farming.

I would also like to submit that any live animal export be banned. Not only is the journey a huge stress on an animal, but New Zealand would have no control over the treatment of that animal on its arrival.

I am happy to be contacted regarding my submission.

Angela Mills

s 9(2)(a)

**From:** Maggie Moss s 9(2)(a)  
**Sent:** Tuesday, 10 May 2016 9:48 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal welfare Regulations

**Categories:** Green Category

I would like all Live animal exports to be banned.

Dogs carried inside cars to be properly secured as well as those on backs of trucks

All the new proposals for Bobby Calves to be law at the start of the 2016 season.

I still see dairy cows with shortened tails .This should not be allowed .

Maggie Moss

s 9(2)(a)

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**From:** Holly Snape s 9(2)(a)  
**Sent:** Thursday, 19 May 2016 4:16 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare submission

**Categories:** Green Category

Kia Ora,

I apologise for the rushed nature of this submission. I do hope it makes sense and I am happy to answer any questions if any part does not.

Under the Proposed regulations for the transport of live animals, the 'risk to the animal' has been removed from the purpose statement so that the statement now reads that what we are trying to protect is New Zealand's reputation rather than for the welfare of the animals. This is a fundamental shift and I am concerned about the implications for animal welfare. I would like to see 'animal welfare' at the heart of the purpose statement.

#### Proposed Animal Welfare Regulations

10.4: I support the move to prohibit pinch and prong collars. As a dog trainer and a person who engages in research on dog training methods, I completely agree that these 'tools' cause pain and distress and research demonstrates there are more effective, pain-free ways to train dogs. This includes dogs who are exhibiting reactive (aggressive) behaviours.

10.5 I support the proposal that the use of collars and/or tethers must not cause cuts, abrasions, swelling, restrict breathing or panting. I would like to see that any collar/tether etc not restrict drinking as this is fundamental to a dogs wellbeing.

10.6 I support the proposal that the use of muzzles must not cause cuts, abrasions, swelling, restrict breathing or panting. I would like to see that muzzles not restrict drinking as this is fundamental to a dogs wellbeing.

10.7 I support the proposal that confined dogs be given access to a shaded and dry resting place. I believe the current law also requires they have free access to drinking water but if not, I would like to see that provision included here.

10.8 I support the proposal around dogs being left in cars

10.10 I support the proposal to prohibit the killing of a cat or dog by drowning and I support the penalty

With regard to exotic animals in circus's – I would like to see the practice prohibited in New Zealand

57, I agree with de-sexing animals being done by a veterinarian or veterinary student.

59. I would like to see more clarity around debarking. I would prefer 'therapeutic reasons to be explicit and for a clear standard – with required evidence of euthanasia being the only other alternative - rather than 'in the best interest of the animal.

60. I agree with prohibiting cropping of dogs ears.

61. I agree with dew claw removal being performed by a veterinarian but believe it should only ever be for therapeutic purposes (for both front and hind dew claws).

62. I agree tail docking should only be done for therapeutic purposes by a veterinarian

Thank you for the consultation process,

Kind regards

Holly Snape

Chief Executive

s 9(2)(a)

[Redacted text block]

[Redacted text block]

s 9(2)(a)

[Redacted text block]

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19 May 2016

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

By online submission to: [Animal.WelfareSubmissions@mpi.govt.nz](mailto:Animal.WelfareSubmissions@mpi.govt.nz)

## **SUBMISSION ON ANIMAL WELFARE REGULATIONS**

This is the submission of Deer Industry New Zealand ('DINZ') regarding the "Proposed regulations for the transport of live animals from New Zealand" (MPI Discussion paper No: 2016/13). DINZ have also commented on the "Proposed Animal Welfare Regulations (Care & Conduct and Surgical & Painful Procedures)" (MPI Discussion Paper No: 2016/12) in a separate submission.

DINZ's submission is in respect only of the specific parts that are applicable to the deer industry. DINZ has not considered clauses on which it does not comment and neither supports nor objects to these.

The contact for this submission is  
Emil Murphy  
Acting Science and Policy Manager  
Deer Industry NZ  
PO Box 10702  
Wellington 6143      Email s 9(2)(a)

## **About DINZ**

DINZ is a levy funded industry-good body established by the Deer Industry New Zealand Regulations 2004 under the Primary Products Marketing Act 1953.

DINZ's functions (under regulation 5(1)) include the following:

- to promote and assist the development of the deer industry in New Zealand; and
- to monitor, and from time to time report on, the economics and efficiency of all components of the deer industry.

DINZ represents producers of farmed deer, and processors, marketers and exporters of products from farmed deer, which are principally venison and velvet.

### *DINZ objectives*

Animal welfare is an integral aspect of farming. This is especially true for farming deer due to their sensitive nature. Deer farmers are stewards of not only the land they farm, but also guardians of the animals they are responsible for, morally as well as legally. From a business point of view, deer will be less productive if they are treated unwell, if they are exposed to stressful environments and if they are not managed to sustain their general wellbeing.

Venison and velvet are both mainly sold in export markets and it is important to the deer industry that our current reputation for good animal welfare is upheld. As deer are sensitive to stress during transport, and the export of deer products is well established, it is DINZ firm view that the export of live deer from New Zealand should only be considered where the intention is building or improving a breeding herd in the receiving country, and the use of germplasms has been deemed unsuitable.

### *1. Submission*

- 1.1. DINZ supports the proposed regulations and the suggested time frames they should come into force.
- 1.2. DINZ propose an offence of non-compliance with the conditional prohibition on the export of livestock for slaughter should relate to each animal, and not to each shipment to provide sufficient deterrent.
- 1.3. DINZ note that the ability of MPI to issue guidance is not dependent on specific allowances in legislation and further submits that MPI ensure that current guidance relating to all live exports are maintained.

Yours sincerely



Emil Murphy  
Acting Science and Policy Manager  
Deer Industry New Zealand

**From:** Lisa Snow § 9(2)(a)  
**Sent:** Thursday, 19 May 2016 2:06 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

**Categories:** Green Category

Please find below my submission on the Animal Welfare Regulation

#### Proposal 1 – Electric Prodders

Your wording under ‘what’s the problem’ in this section is incorrect as it states that “if misused, electric prodders can cause pain and distress”. The whole purpose of electric prodders, even when used correctly, is to cause pain so the animal will move away from this.

The exceptions for circuses and rodeos are not justified. Under no circumstances should electric prodders be used where animals are used for entertainment. The Health & Safety argument for using electric prodders could be negated by not having animals in circuses and banning rodeos. If people wish to put themselves at risk by handling stressed or uncooperative animals at circuses and rodeos they should do so at their own peril – prods are used to move animals solely for the (sick) entertainment of the humans.

I agree with an infringement for first offences, however think \$300 is too low. A three strikes rule, or one warning infringement then prosecution should be developed.

#### 2 – use of Goads

In so circumstances should exceptions be made allowing use of goads on sensitive areas of animals.

I agree with an infringement for first offences, however think \$300 is too low. A three strikes rule, or one warning infringement then prosecution should be developed.

#### 3. – Tail Twisting

This should be completely banned with no level of acceptability.

#### 4. – Dogs, Pinch or Prong Collars

I completely agree with this change.

There are no legitimate uses for these collars. There is much international research that proves that these collars cause stress, pain and distress in dogs. Furthermore, training using methods like these are not considered best practice in behavioural modification.

Prong collars need to be completely banned and not used by law enforcement or defence forces. If these trainers are so ‘skilled’ they will not require these collars as they will have the training and knowledge to handle these dogs without them. And if a dog is really that bad, either its trainers have failed it or it is not suitable for the job.



This proposal should be widened to include the use of ALL shock collars I. This should be defined as collars with electrodes on them. This would ensure only true 'vibration' collars (as are used by trainers of deaf dogs) are able to be used.

Sale of prong collars – this should be banned. If something it prohibited, it should be illegal to sell.

Penalties – given how lenient the judiciary is on Animal Welfare prosecutions, the penalties as stated would not result in offenders being given the maximum penalty anyway. However, for first time offences, perhaps a fine would be more appropriate (\$1,000 would be a reasonable level) with prosecution for further offences as an Animal Welfare Act violation and maximum penalties available to be handed down.

## 5. Injuries from collars or tethering

This should cover all species. Proposal should state that collars that are not fixed should not be used (ie no choke chains, martingale collars etc). As in other countries, there should be a limit on the number of hours a day a dog or other animal can be tethered (this may vary for species).

I agree that 'must not prevent drinking' should be included.

I agree with an infringement for first offences, however think \$300 is too low. A three strikes rule, or one warning infringement then prosecution should be developed.

## 6. Muzzling

I agree with this proposal and agree it should include limitations on the sorts of muzzles that can be used. Muzzles that restrict panting or drinking should only be able to be used up to a maximum amount of time (eg 15 minutes to allow a veterinary check). Dogs show and relieve stress by panting so it is essential that if muzzled they can continue to exhibit this natural behaviour.

## 7. Dogs dry and shaded shelter

This should be expanded to include all animals from goats and sheep to pet rabbits.

There should be a limit on time an animal can be left without shade on a sunny day to ensure that a person leaving their dog for a few minutes to run a quick errand or use a public toilet while out on a walk can do this.

## 8. Dogs in hot vehicles

This should be expanded to include all animals (including those being exported live) with a maximum temperature stipulated. Digital thermometers are widely available making it feasible for people with pets in cars to check on the temperature and understand at what point the vehicle is too hot. This would also allow for a clear level at which an infringement or prosecution can be taken. Otherwise it is too easy for people to claim they thought the temperature level was ok.



#### 9. Dogs on moving vehicles

I agree with this change. Animal Welfare Inspectors should have the power to stop a vehicle if they believe an animal is suffering or in danger of injury.

#### 10. Drowning dogs and cats

This should be expanded to include all animals. If it is cruel to drown a dog it is cruel to drown a pig, rabbit or goat!

The suggested maximum penalty is too low.

#### 11 & 12. Eels, Lobsters etc

As with any killing this should be done with the least possible distress. Eels should be killed humanely prior to desliming, and Lobsters etc rendered insensible prior to killing.

#### 13. Goat Tethering

There should be a limit to the number of hours a day a goat can be tethered and during this time they must have access to shelter, food and water.

I agree with an infringement for first offences, however think \$300 is too low. A three strikes rule, or one warning infringement then prosecution should be developed.

#### 17 & 18 Hens

The current hens per M2 sizes are woefully inadequate for hens to express normal patterns of behaviour. This should be reassessed and ALL hens should have access to open outdoor space.

#### 19. Hens

This should be regulated as clearly farmers aren't capable of recognising that the build up of excreta and adequate space to move for hens is required.

#### 20. Hens

I was not aware induced moulting was occurring, and this practice should be illegal.

#### 29. Rodeo & Fireworks'

Given the number of animals, including horses, that are spooked by fireworks each year it is unbelievable that this goes on at Rodeos.

I don't believe this proposal regarding Rodeos goes far enough. Rodeos clearly involve activities that would not be tolerated on other animals (eg calf roping). I call for a complete ban on Rodeos in New Zealand.

### 30. Circuses

Given as you state there are no exotic animals in circuses in New Zealand, I propose a complete ban on this so it can not occur in the future. Furthermore, use of any animals for entertainment (circuses or rodeo) should be banned.

### 51. Hot branding

I agree this should be banned as there are more humane alternatives available.

### 56. Declawing Cats

I agree with this proposal however rehoming should be considered before declawing a cat at risk of euthanasia.

### 57. Desexing

I agree with the proposal. If vet nurses are properly trained and qualified to undertake this procedure then I support this as it would save shelters money.

### 58. Freeze branding dogs

This should be banned. Dogs that need to be identified to enter hunting blocks can be microchip scanned. In addition, I would like to see the Kiwi Safe training not use shock collars and better more humane training methods developed.

### 59. Dog Debarking

This should be completely banned. The reasons for the dog barking should be fully investigated and appropriate training (positive training!) undertaken. Debarking is inhumane.

### 60. Ear cropping

I support this remaining a banned procedure

62. Dog tail docking

I support this proposal. Tails should only be docked after an injury has occurred. I think this regulation should state that tails cannot be docked for breed standard or aesthetic reasons.

Docking should only be carried out by veterinary surgeons under anaesthetic regardless of the age of the dog (ie if a puppy is born with a deformed tail that requires removal this must be done by a vet).

Kind regards

Lisa Snow

s 9(2)(a)

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611

Jillian Latham

s 9(2)(a)

19 May 2016

To: animal.welfaresubmissions@mpi.govt.nz

## Submission on Animal Welfare Regulations

### Rodeos

Fireworks should continue to be banned at rodeos. As it is well documented that animals across the spectrum are frightened by fireworks, then the aftermath of fireworks does not justify their use which is only for entertainment purposes.

I would like to take this opportunity to support the call for a ban of rodeos in New Zealand - which without a doubt has been voiced loud and clear in this country. Whether it be circuses, marine parks, horse and dog racing - animals in entertainment are now being seen for what they are - cruel and unnecessary, and thanks to an unyielding social media influence are slowly but surely being rejected by a more modern and aware society.

I have attended and filmed at 11 rodeos over the past three years and each rodeo has committed numerous breaches despite MPI's recent efforts to educate the rodeo community. After having attended the NZ Rodeo Association's AGM in 2015 it was clear to me that the members hold little regard for the Rodeo Code and the Animal Welfare Act and have in the past hid injuries and deaths from MPI, including as was admitted by one rodeo member 'taking the injured animals out themselves' without a vet or official being present. This is an example of why it is impossible to trust that the rodeo community. There is too much opportunity for abuse to happen unwatched. Condoning rodeo sends mixed messages to society about its treatment of animals and makes a mockery of what is a well intentioned Animal Welfare Act.

Finally MPI inspectors are poorly resourced and have been inadequately trained in order to monitor rodeos with any credibility. I believe their time would be better spent on monitoring animal welfare on farms and lifestyle blocks.

### 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.

I propose that dog racing be banned in New Zealand. It consists of live baiting, drugging, over-breeding and killing of surplus dogs while also adding to pressure on already stretched animal welfare groups. This is not an industry NZ should find palatable and it would be naïve of NAWAC and MPI to think that these things don't go on. As with other animal exploitive issues it is only a matter of time before the public becomes more educated on dog racing and the cruelty entrenched throughout.



## **Dogs and Cats**

### **Drowning of 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.

## **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.

## **Horses and Donkeys**

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.

## **Layer Hens**

### **Opportunity to express normal behaviours in housing systems**

All cages need to be banned. They fail to provide the physical, health and behavioural needs of hens.

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 as per Sections 9, 68 Animal Welfare Act 1999

612  
Nora van der Voorden

s 9(2)(a)

Animal.WelfareSubmissions@mpi.govt.nz

Nora MPI submission Animal Welfare 2106

The MPI states that they "promote policies for the humane treatment of animals".

In that case the terminology used in the MPI discussion document leaves a lot to be desired. For example I struggle with understanding how "strong requirements" would manifest.

And "Strong recommendations". A recommendation is just that, a toothless suggestion to change entrenched bad habits. Not even a warning or three strikes you're out!

As to "Minimum Standards", why go for the lowest common denominator and allow for continued cruelty.

The proposed transition period to allow farmers to adapt to better practices confirms my concern that this bill as it is currently worded elevates practicality and economics over all else, as explicit factors to be used in creating legislation. These are exactly the factors which historically allowed cruel farming practices. Surely that does not promise change.

Even 7 years is too long a transition period before these strong requirements become obligations under the law. During the preceding time loopholes can still be used to escape punishment and not address bad attitudes and behaviour.

These loopholes need to be addressed much more quickly.

#### Enactment of Punishment for Inadequate laws

People become desensitised when handling difficult animals every day, working long hours with animals they don't like. I.e. Animals which are seen as stupid, like chickens or young silly calves and sheep. All these creatures can be annoying, uncooperative, loud and smell. I have seen the kindest people do really cruel things out of frustration.

The size or value of the animal is irrelevant, so is intellect. Every animal, even sea creatures, has a right to not suffer fear, hunger, thirst and all the other physical and mental factors that go with flesh and blood and brain.

#### Export of Live Animals



I oppose the export of live animals be it for breeding or slaughter. Stock losses are too high. Seasickness, starvation, ammonia inhalation, overheating or dying of thirst is a terrible way to die. Those long journeys are far too stressful. An animal cannot be expected to understand what is happening to them, and a vet on board can't change the conditions or explain to the animals what is happening.

### Caged hens

The proposal to have larger holding areas with more birds to the cage is said to be worse for them than the current 1 or 2 per cage presently being phased out. The hens are still denied a "normal life". They naturally eat lots of grass, naturally spend most of the day scratching for grubs and insects and sunbathing and having dust baths. Chickens are naturally very busy creatures and this boring existence will see them fighting among themselves. Debeaking does not stop them boringly pecking at each other. It has now been found that in the new colony cages hens get their heads caught in the bars, in extricating them the handlers sometimes cause decapitation or loss of wings. Colony caging has not proven to be an improvement to the quality of the hen's life. The cost to the farmer installing the colony cages is huge but will not be beneficial to either hen or farmer.

I also oppose the continued use of farming sows in crates.

No way is caged life normal and as our animal welfare laws require freedom from distress or pain and freedom to display normal behaviour as well as freedom from hunger and thirst, from discomfort and inadequate shelter, and from disease and injury. The issue still has not been adequately addressed.

### Factory Farming

I think it is time for New Zealand 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.

It is timely to modernise the regulations you have created regarding factory farmed animals, such as the ones that relate to farrowing crates and colony cages setting 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.

### Standards Symptomatic of Carelessness

I don't understand how the offences that people have reportedly been punished for are classified as "low to medium seriousness" Is low seriousness equivalent to hair pulling, eye gouging, knee smashing, finger breaking, or chopping off a finger in humans?

How would you classify "starvation" in humans in captivity? Low or medium seriousness?

All the cruel actions listed above are intentional, not symptomatically careless but symptomatically intentional behaviour.

Seen in this light, it is not acceptable that currently only 1% of complaints result in prosecution. A strong message needs to be sent that the New Zealand populace recognises animals as 'sentient' beings and that the public find cruel behaviour intolerable and are demanding penalties large enough to act as real deterrents.

As well as prosecution the offender may need lessons in compassion and perhaps some NLP type reprogramming.

Will the pulling off of wings, or heads of chickens in the new colony cages be considered serious or not? Is it really acceptable to allow all those generations of hens to be subjected to this cruel behaviour for another 7 years while the farmer learns to comply with the obligation of compassionate conduct?

Even the valuable working dog, man's slave, often out in the sun is rarely treated with the respect it deserves. Too often they spend long hours in sweat box kennels or tied up in the hot sun. With a collar and a chain and wire surrounds they don't have much choice to move into the shade and yet the dog is probably the farmers most valuable asset.

As it is not practical or desirable to have an army of animal welfare enforcement officers swarming the country side, more money and resources must be put into education. Most people can learn parenting skills. Most people will be able to learn animal husbandry skills which encompass compassionate behaviour.

The wording/language used by the MPI in the overview document is so typically always about benefit to the farmer.

Fortunately there are several suitably qualified groups like SPCA and SAFE who will give balance to this discussion document. They represent quite a large part of the population too and as such need to be listened to with respect.

I have not read all of the several hundred pages of the act. I don't need to I get the drift! There is still the prevailing perception that animals are here for human benefit only and that we can do what we want with them or to them regardless.

#### Shelter belts

I believe it should be mandatory for shade to be provided for all animals. There is enough proof now around the benefits of shelterbelts for stock. The planting of shelter will have wider benefit for the environment too.

I consider that this proposed Animal Welfare Act does not go far enough to adequately reflect the attitudes of the general public which sees animals as sentient beings. Society wants laws which actually demand adherence to the basic 5 Freedoms referred to in the 1999 Act, not mere lip service.



✓ 613

**From:** s 9(2)(a)  
**Sent:** Tuesday, 10 May 2016 2:21 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** NZ Thoroughbred Racing's submission to MPI on Proposed Animal Welfare Regulations  
**Attachments:** Proposed Animal Welfare Regulations NZ Thoroughbred Racing Submission May2016 Final.pdf  
**Categories:** Green Category

Please find attached NZ Thoroughbred Racing's submission to MPI on Proposed Animal Welfare Regulations, namely:

1. Proposed Regulations for the Transport of Live Animals from New Zealand
2. Proposed Animal Welfare Regulations (Care & Conduct and Surgical & Painful Procedures)

Regards,

s 9(2)(a)



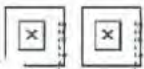
s 9(2)(a)

Company Secretary

106-110 Jackson Street, Petone, Wellington 5012

s 9(2)(a)

nzracing.co.nz



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## **New Zealand Thoroughbred Racing Inc. (NZTR)**

### **Submission to The Ministry of Primary Industries**

**Proposed Regulations for the Transport of Live Animals from New Zealand**

**And**

**Proposed Animal Welfare Regulations (Care & Conduct and Surgical & Painful Procedures)**

## 1.0 Introduction

NZTR welcomes this opportunity to submit to the Ministry of Primary Industries on proposed Animal Welfare Regulations.

NZTR is supportive of proposed Regulations under the Animal Welfare Act.

Participants in the equine racing industries in New Zealand (trainers, owners, breeders, riders, stable-hands, farriers, vets, float drivers and other participants) have a huge vested interest in maintaining robust animal welfare regulations.

## 2.0 Executive Summary

Before drafting a submission, NZTR sought advice from experts on issues covered by the proposed regulations and reviewed its Horse Welfare Guidelines and The Rules of Racing (both available to view at [www.nzracing.co.nz](http://www.nzracing.co.nz)) to check alignment with proposed regulations.

With a shrinking thoroughbred population in both racing codes and an associated increase in bloodstock values there are now higher expected standards from trainers, owners, breeders and officials around equine health and welfare. This has led to more veterinary involvement in some areas of care and welfare where there had been lay people carrying out some veterinary procedures. Coupled with this there has been recognition that veterinary involvement carries added benefits.

There are 12 proposed regulations relevant or specific to horses.

Comments are submitted on each relevant regulation.

More detailed comment and recommendations are submitted on equine dentistry, equine rectal examination and the caslick's procedure.

Greg Purcell  
Chief Executive  
New Zealand Thoroughbred Racing  
106-110 Jackson Street  
Petone 5013

s 9(2)(a)

## Proposed Regulations for the Transport of Live Animals from New Zealand

NZTR complies with the International Federation of Horseracing Authorities (IFHA) Transportation Welfare Guidelines.

The IFHA, in its role to promote good regulation and best practice internationally across horseracing, recognises the central role played by the horse itself and so the importance of its welfare. The Federation formed the IFHA Animal Welfare Committee in 2010 and implemented a number of broad principles of racehorse welfare to be adopted by the Federation's members into more detailed outputs to assure racehorse welfare.

The Animal Welfare Committee plays a leading role in promoting overall welfare of the thoroughbred horse however the transportation of thoroughbreds is a specific area of risk that requires special attention by the industry. Accordingly the IFHA International Movement of Horses Committee (IMHC) published principles and guidelines to specifically promote the safety and welfare of thoroughbred horses during transportation for training, competition and breeding purposes.

The following areas of welfare are covered:

1. respiratory disease particularly shipping fever (pleuropneumonia) which is a significant problem associated with the transport of horses and has been reported to occur in up to 12% of horses transported by road and up 30-40% of horses transported by air
2. fighting among horses/ provision of adequate space
3. nursing foals including the minimum age that foals can be transported
4. the high centre of gravity of horses - horses have a relatively high centre of gravity and carry 60%+ of their body weight on their forelimbs. transport of horses is likely to be more tiring to horses than most other species because of uneven load distribution and the need for horses to constantly brace and adjust their position in response to vehicle movements.
5. thermoregulation especially at high temperatures, high humidity and in poorly ventilated areas
6. the stress of isolation, a significant source of stress for herd animals such as the horse and its effect on immune suppression
7. dehydration
8. inadequate rest periods
9. the impact of disease transmission during transportation on welfare
10. management during control post stopovers

Ministry of Primary Industries' standards detail the care that must be given when horses are transported off shore, either by air or sea. Animal Welfare Export Certificates (AWECs) set out these standards of care and how welfare activities are measured. In addition to generic international guidelines by a number of international bodies such as IATA and the OIE, New Zealand Standards have been negotiated with those who transport horses by sea and air from New Zealand. These detail the planning, reporting, competence of grooms and requirements relating to the care and welfare of horses in transit.

NZTR supports proposed regulations for the transport of live animals from New Zealand.



# Proposed Animal Welfare Regulations (Care & Conduct and Surgical & Painful Procedures)

## 1.0 NZTR Animal Welfare Overview

NZTR applies animal welfare, with the support of the Racing Integrity Unit (RIU), through its Horse Welfare Guidelines and The Rules of Racing.

In 2011-12 NZTR reviewed its welfare needs and, as a result, started to introduce stronger welfare standards and practices.

The number of horses leaving Thoroughbred racing each year and requiring new homes averages 803<sup>1</sup>. Once horses leave the racing industry they are no longer within the industry's jurisdiction and this presents a challenge. In response NZTR launched the Thoroughbreds in Equestrian Sport (TiES) programme in 2013 and Mandatory Horse Retirement Notification in 2014.

In 2015 and 2016 NZTR's priorities for horse welfare have been:

1. enforcing Mandatory Horse Retirement Notification
2. completing development of an online Equine Injury Database with Waikato University to identify the frequency, type and outcome of racing injuries and fatalities and serve as a data source to help improve safety and prevent injuries
3. establishing stronger links with re-homing providers
4. building on the TiES partnership with Equestrian Sports New Zealand (ESNZ);
5. strengthening its Prohibited Substance Regulations
6. continuing to audit all jumping venues annually and all incidents, with the RIU, to ensure appropriate safety and welfare policies are in place
7. supporting NZ Racing Board funding of up to \$250,000 per annum for equine research and development by the NZ Equine Trust
8. providing \$22,000 of funding to the NZ Equine Research Foundation and \$7,000 of funding to the NZ Equine Health Association for equine health and welfare research
9. working with the NZ Equine Health Association to reach full signatory status on the Government-Industry Agreement on Biosecurity Readiness and Response

## 2.0 Proposed Regulations

### Regulations 14 & 15: Whips and Injuries from equipment such as halters, head ropes, and saddles

NZTR advises the current Rules of Racing, specifically Rule 638 (Running Races) and Rule 801 (Serious Racing Offences) together with *Guidelines with Respect to Acceptable Use of the Whip*, NZTR Directive *No Whip*, and full signatory status of the Article 11 B (*Minimum Standard Guidelines On Use Of The Whip*) of the International Agreement for Breeding, Racing and Wagering are all in alignment with the proposed regulations on whips.

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<sup>1</sup> Average microchip returns covering the 10-year period from 1 August 2004 to 31 July 2014

NZEVA Policy 10a states *Excessive or incorrect use of a whip on any horse, including the whipping of horses unable to improve their performance or their position in a race field, is not condoned.*

Proposed regulations covering injuries from equipment such as halters, head ropes, and saddles strengthens the minimum standards of the Code of Welfare (Horses and Donkeys).

NZTR supports both these proposed regulations.

#### **Regulation 16: Tethering requirements**

The regulation will require tethered horses to have constant access to water, food, and shelter. Tethering is not generally practised in racing for long periods of time; only while saddling, shoeing and grooming.

In the code 'tethering' refers to securing a horse for the purpose of grazing. This is different from 'tying up' a horse for management purposes such as grooming or attention by a farrier.

NZTR supports this proposed regulation.

#### **Regulation 51: Hot branding**

This bans hot branding. Since the introduction of freeze branding using liquid nitrogen there has been no need for the continuation of hot branding and NZTR is not aware of any foals being hot branded.

Rule 407 of the Rules of Racing specifically refers to freeze branding: *'In order to be eligible for registration, a horse must be: ...freeze branded...'*

NZTR supports this proposed regulation.

#### **Regulations 52 & 53: Embryo Collection and Artificial Insemination**

These procedures are not relevant to Thoroughbreds because both procedures are expressly banned under the International Agreement for Breeding, Racing and Wagering to which NZTR is a full signatory (Rule 407 in The Rules of Racing).

#### **Regulation 55: Equine Dentistry**

Many procedures previously and currently carried out without pain relief are no longer acceptable. It is recommended regulation of certain procedures and methods would prevent unnecessary pain to horses.

##### **a) Equine Dental Technicians (EDTs)**

Currently there is no regulation in New Zealand as to who can call themselves an equine dental technician (EDT). There is no standardised level of qualification ratified that they must attain before starting work as an EDT. This makes it very difficult to say who can and cannot carry out

certain procedures among the lay profession, other than to regulate for veterinary required and non veterinary required.

The availability of a new oral sedative paste called Dormosedan gel has led to an increase in EDTs performing various surgical procedures in New Zealand without veterinary assistance. Dormosedan gel can be purchased under prescription from a veterinarian. The licence for this product does state that when used for equine dentistry, only basic dentistry using manual tools is permissible.

Any veterinarian who is prescribing this drug for equine dentistry must try to ensure the terms of licence are not being broken. It is our understanding that the terms of the prescription licensing for this drug are potentially being broken by EDTs.

Regulation will strengthen the ability of veterinarians to ensure that painful procedures are not being carried out under inadequate pain prevention protocol.

NZTR has not identified any relevant NZ Equine Veterinary Association (NZEVA) policies to define EDTs and the work they are permitted to carry out. NZTR supports regulation of EDTs in New Zealand.

#### **b) Manual Dentistry Tools**

NZTR strongly recommends that only manual dentistry tools are used by non-veterinary dental technicians; i.e. no power tools. Power tools can cause over reduction of teeth, overheating of teeth and exposure of pulp structures. Currently it is advised the majority of EDTs currently use manual tools for most of their dental work. Some would use power tools occasionally for certain circumstance and only a small few would use power tools as their main equipment.

NZTR advises that preventing the use of power tools to EDTs would not significantly affect their ability to carry out their current work.

In the UK, only EDTs qualified under the British Equine Veterinary Association equine dentistry certificate, and veterinarians, are allowed to use power tools. They must be used only on a sedated horse under veterinary supervision.

NZTR supports equivalent regulations in New Zealand.

#### **c) Incisor Alignment**

The practice of incisor alignment by cutting the occlusal end of the incisor teeth to the same level with high-speed rotary tools should not be permitted. There is no valid scientific reason for this procedure, which carries significant risk of multiple tooth death, as a result of pulp exposure. This procedure is currently being carried out by EDTs in NZ. Australian veterinarians have had major problems with EDTs performing this procedure. They have had numerous cases of horses suffering painful consequences. Equine dental Veterinarians do not advocate cutting incisors, canines or any other teeth for reduction purposes.

Any manual equine dentistry tool should not be used in a way likely to cause damage to dental or surrounding soft tissue structures. No manual dental instrument should be used to cut, chip or shear any tooth. Pulp exposure or fracture is a high risk with these procedures and can result in serious consequences including death of the animal.

#### **d) Tooth Extraction and Endodontic Procedures**

All equine dental extractions should be performed by a Veterinarian or Veterinary student under direct supervision. It is essential that correct pain relief be used for all procedures. In general, all dental procedures involving below the gum-line should be performed by a veterinarian.

It is understood by NZTR that some EDTs are performing extraction of equine teeth. This includes incisor, canine, wolf and cheek teeth. Most EDTs would not perform these advanced procedures. It certainly would not represent a large proportion of their work. Recent evidence has shown techniques used for tooth extraction by EDTs are poor. Little attention is placed on pain relief and tooth fracture without follow up has been reported.

There are currently no Regulations mandating the above recommendations.

#### **e) Deciduous teeth or caps**

Deciduous incisors or cheek teeth that are so loose as can be removed by the fingers would be permissible for a non-veterinarian to remove. In all other cases sedation and extraction by a veterinarian is required.

Wolf teeth extraction is a one off procedure in a horse's life at around 2 to 3 years of age. In most circumstances it is still a significant tooth extraction requiring the careful stretching and tearing of the periodontal ligament before removal. At a minimum NZTR recommends all horses must be sedated and local anaesthesia used before extraction of these teeth.

Under all definitions it is an act of veterinary surgery and therefore should only be done by such a person. We do recognise that there are a large number of horses, which would require this procedure every year in NZ; and that there may be an issue with having sufficient vets with expertise in this area to cover such a demand. It is therefore a possibility that an exception to the extraction and gum-line regulation may be made to allow some EDTs to perform the procedure under direct veterinary supervision. Sedation and local anaesthesia would be required for all such procedures.

#### **f) Endodontic procedures**

Equine endodontics is considered by veterinary specialists to be one of the most difficult of all, due mainly to the complex tooth anatomy. Currently there are a small number of EDTs carrying out equine endodontic procedures. It is not known how successful their procedures have been. However as no veterinarians in New Zealand are currently trained in such procedures, the EDTs would not have been observed by anyone with sufficient knowledge to judge at the time. (Dr Ian Dacre, a NZ Veterinarian is trained in endodontics but does not currently reside in NZ)

As endodontics are a highly specialised area of equine dentistry, NZTR recommends that this should be regulated as a veterinary only procedure.

Further, NZTR supports reservation of the term 'Equine Dentist' for a veterinarian with a specialist qualification such a Diplomat or Fellowship level. Although the public may refer to lay equine dental operators as equine dentists, it is correct at government level that they are referred to as Equine Dental Technicians.



### **Regulation 73: Blistering, Firing or Nicking**

Surgical procedures prohibited under section 21(2) of the Animal Welfare Act include blistering, firing and nicking.

NZTR supports the proposed regulation.

### **Regulation 74: Tail Docking**

NZTR supports the proposed regulation.

### **Regulation 75 & 76: Rectal Examination**

Rectal examination in an equine breeding use is carried out to allow palpation and hand held probe ultrasound examination of the internal genitalia. This is used to determine the stage of reproductive cycle when determining optimum time of service, pregnancy diagnosis, twin crushing etc.

Rectal examination is quite routine in other aspects of equine veterinary practice as required as part of a clinical examination for certain conditions, e.g. a horse presenting with colic symptoms.

NZTR understands there are now very few lay people in the country carrying out this procedure.

Policy 10f of the NZEVA maintains that *examination of the horse per rectum either by manual palpation or ultrasound should be considered a significant surgical procedure and should only be performed by veterinarians.*

NZTR advises the welfare and safety of the broodmare, operator and assistants require this procedure to be done by an experienced person who is aware of the anatomy and physiology, and is readily able to recognise pathology, has an understanding of the risks of the procedure and has an understanding of the use of chemical restraint; in practical terms a veterinarian.

The risks associated with the rectal examination of broodmares are well documented with of course rectal rupture always on the mind of any veterinarian carrying out this procedure.

Mares are not always accepting, young maiden mares especially carry higher risk. Sedation is often a requirement in such cases and again requires the possession of RVMs and an understanding of their administration and use. Over the years there have been a number of injuries associated with broodmare work in a crush.

The introduction and use of the modern tranquillisers into veterinary practice have done much to reduce this risk of injury to horse, operator and associated assistants. The safe use of these for horse and operator require some understanding of their pharmacology and effects.

The number of rectal examinations required per cycle is reduced when carried out by an experienced operator as the assessment of optimal time of service is better understood, reducing the number of times a mare is exposed to this procedure obviously reduces the risk.

There appear at present to be 3 or 4 lay operators across the country performing ultrasound rectal examination of broodmares.

NZTR supports the proposed regulation.

#### **Regulation 77: Caslick's Procedure**

The caslick procedure involves local anaesthetic being infiltrated at the skin/mucosal border of the proximal vulva. A thin sliver of tissue is removed and the created wound is sutured. Sutures are removed at ~10 days, the vulva effectively heals and remains closed until an episiotomy (caslick opening) is performed prior to foaling or for a further natural service. The procedure effectively reduces issues created by a pneumovagina an issue related to anal/vulval shape related to conformation and age induced shape changes.

Veterinary opinion is united that primary caslicking is a surgical procedure and should be vet-only. The rationale being that a brood mare which is caslicked many times throughout her life inappropriate cutting of the tissue in initial procedures can influence the ease with which the vulva can be sutured in consequent repairs over the years.

The grey area is that in a large, commercial thoroughbred stud a very experienced stud employee might repair a caslick, with a couple of sutures; the justification being that it saves a veterinarian returning to the stud at an inconvenient time. NZTR advises this is not sufficient reason.

Caslicking procedure obviously requires the possession and use of Restricted Veterinary Medicines (RVMs), at least local anaesthetic and potentially sedation for a fractious mare thus would have to require a Veterinary Operating Instruction (VOI) at least.

NZTR supports the proposed regulation.

#### **Regulation 78: Castration**

NZTR supports the proposed regulation.

Provided by e-mail to [Animal.WelfareSubmissions@mpi.govt.nz](mailto:Animal.WelfareSubmissions@mpi.govt.nz)

**From:** Hazel Dickinson s 9(2)(a)  
**Sent:** Thursday, 5 May 2016 8:21 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** ???

What an appalling sham and lot of goobledegook!

Where to start on your proposals??? Utter rubbish!

STOP the factory farms.

STOP the 'Bobby Calf' trade, (they're far too young to be separated from their mothers and should remain with their mothers as they do in Europe for much, much longer!)

STOP the cruel testing on animals, science proves time and again their results DO NOT translate to humans

STOP testing cosmetics/cleaning products on them, we have plenty enough selection, we do not NEED any more!

ENSURE live exports remain BANNED!

Proper regulations on 'Free Range'-this does not mean all in a big shed with chickens only able to get outside if they cross other chickens territory, which they will NOT do! Therefore proper consultation from EXPERTS in the field of animal behaviour.

Finally, NO sow needs to be kept in farrow crates (CAGES) at any point of her pregnancy.....this is such an untruth, rather she needs SPACE!

I will continue to watch and circulate this FARCE!

MAKE NEW ZEALAND PROUD!

Hazel Dickinson

**From:** evie que s 9(2)(a)  
**Sent:** Sunday, 8 May 2016 5:52 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** SUBMISSION ON ANIMAL WELFARE REGULATION  
  
**Importance:** High  
  
**Categories:** Green Category

My submission on Animal Welfare Regulation- Evie Quinton

I believe that the following should be banned

- ✓ Live export
- ✓ Slaughtering of bobby calves under 2 weeks old
- ✓ Tethering goats and pigs
- ✓ Colony cages and battery before 2022
- ✓ Rodeo
- ✓ Electric prodders
- ✓ Prong collars
- ✓ Freeze branding
- ✓ Horse and greyhound racing
- ✓ Trawling
- ✓ Backyard breeding
- ✓ BSL (breed specific legislation)

When enforceability, clarity and transparency of the animal welfare system is mentioned i feel that more is being overlooked than achieved.

For example convicted animal abuser and neglecter Anne Powers recently appeared in the High Court. The judge ruled in favour of SPCA removing MOST of the animals from her care, or lack of. He was also charged and is forbidden to own or have another animal for 8 years.

A recidivist, a woman with known form can still own animals that are in clear risk of harm.

Will the new regulations "toughen up" on known animal abusers and keep a watchful eye on the new?

MPI has 11-17 specialist animal welfare inspectors to monitor the wellbeing of 60 million farmed animals, this is why i strongly believe that where complaints have been made and ill footage that has been shown within slaughterhouses, layer, sheep and pig farming and complete dairy industry; animals should be monitored by camera.

Breeding of companion animals and dog owner license. (Falling under care & conduct)

Enforcing a limit to who, where and how many litters a dog, cat, rabbit etc can have. Funding desexing (other than amnesty.) Many dogs and cats live in poor conditions, usually in low socioeconomic areas of NZ. These dogs are usually entire, unregistered and many are never taken off a chain, they live in a yard as a ornament, in their own faeces and are never socialized as nature intended nor can they display or fulfill their natural behaviours.



If a dog license and desexing initiative was put in place i believe dog bites would dramatically drop, euthanasia rates would slow and SPCA, rescue organisations and Animal Management would slowly but surely have control of New Zealand's companion animals.

#### Breed Specific Legislation (BSL)

Pit bulls and Pit bull "types" have been targeted for years all around the world. The recent amnesty bill which to desex and register Pit bulls only shows how NZ's code of practice is not only faulty but how it is a highly uneducated move.

An ultimatum was made, owners were given a month to agree and adhere to conditions or council will remove your dog and have it euthanized.

The trend in prevention of dog bites should shift in favor of multifactorial approaches focusing on improved ownership and husbandry practices, better understanding of dog behavior, education of parents and children regarding safety around dogs, and consistent enforcement of dangerous dog/reckless owner ordinances in communities.

Effective laws hold all dog owners responsible for the humane care, custody, and control of all dogs regardless of breed or type.

13,823 animal welfare complaints received in 2012, 44 prosecutions taken.

[http://www.nzherald.co.nz/nz/news/article.cfm?c\\_id=1&objectid=11352040](http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=11352040) regards below

#### SPCA Top five on the List of Shame: 2014

1. Joshua Heka filmed himself mutilating and taunting a number of possums before decapitating them or bludgeoning them to death. He was imprisoned for two years and four months.
2. A Tauranga man charged with ill-treating a puppy was fined \$1,500, disqualified from owning animals for five years and ordered to pay reparations of \$401.89. The puppy suffered a deep puncture wound to the top of the head, and dental and cheek fractures in a prolonged beating.
3. A kitten was found in a tied up plastic bag at Whangarei's Mair Park. The kitten was still alive, but had such bad deformities in his two front legs he had to be euthanased on humane grounds. The person or persons responsible have not been found.
4. A Canterbury farmer was imprisoned for four months and ordered to pay reparations of \$676.80 after he struck two pigs with a metal pole when he became angry. When another pig tried to escape from the holding yard, he chased it for some time and then ran over its head with a quad bike.
5. A Whangarei man charged with ill treating his dog was sentenced to 125 hours of community work, disqualified from owning animals for three years and ordered to pay reparations of \$420. His dog was very thin and had major hair loss over most of its body because of mange which had been left untreated.

If our animal welfare system leads the world then there is much to be said. Animal abusers should have increased fines and imprisonment, added to a watch list, made public knowledge and prosecuted for life.

For the large number of animals in NZ i believe we do need an independent animal commissioner to not only get on top and care for all our animals, but to further our industry and reputation.

Regards

Evie Quinton

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Out of Scope

**From:** s 9(2)(a)  
**Sent:** Saturday, 14 May 2016 9:52 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** "Submission on proposed regulations for the export of live animals"  
**Categories:** Green Category

To Whom It May Concern

Submission on proposed regulations for the export of live animals

I submit that there should be no live export of animals from New Zealand, for any purpose, breeding or otherwise.

There is no guarantee that overseas parties receiving New Zealand animals will treat them as we would expect, or that they will not slaughter them inhumanely once they have been bred from.

Carey Conn

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

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**From:** cherylyntravers s 9(2)(a)  
**Sent:** Sunday, 15 May 2016 11:32 a.m.  
**To:** Animal Welfare Policy  
**Subject:** Question

**Categories:** Green Category

Please

End all killing

And exporting

Of all animals

You are just making it a little better and then you will kill them How is that fair to them?

You spend hundreds and thousands of dollars in all this When hopefully one day it will all End and all animal

'industries ' will disappear and the fields where dead animals used to stand will be full of plants and fruits and grains  
for all No more slaughterhouses Thanks Cheryl travers

( Sent from my iPhone

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**From:** korinos65 s 9(2)(a)  
**Sent:** Sunday, 15 May 2016 7:08 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations'  
**Categories:** Green Category

618

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

*My name is Theodoros Aslanoglou*

*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.*

*I also 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.*

*I agree with the proposal of the conditional prohibition on the export of livestock for slaughter to be moved into regulations under the animal welfare Act 1999.*

*I believe the proposed regulatory offences and penalties for non compliance with the conditional prohibition should be a lot higher.*

*I agree with the proposal to bring into force by late 2016 the new provisions of the Act that expand the matters the Director-General of MPI must or may consider when assessing an application for export.*

*I agree on the proposal to repeal the legislative provision " Guidelines for issue of animal welfare export certificates" by late 2016.*

*I agree on the proposal to bring into force by late 2016 , the new provision that allows the Director-General of MPI to refuse to issue an animal welfare export certificate, or revoke or amend a certificate and allow the DG of MPI to impose conditions on an animal welfare export certificate.*

*Regards Theodoros Aslanoglou.*

Sent from my Samsung Galaxy smartphone.

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**From:** Lewis Bollard s 9(2)(a)  
**Sent:** Wednesday, 11 May 2016 4:22 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir or Madam,

I work in farm animal welfare, but am submitting this comment in my personal capacity. The proposed animal welfare regulations on surgical and painful procedures, and the live export of farm animals from New Zealand, are a good first step but do not go far enough. In particular:

1. I strongly support the new requirement for the use of pain relief during the dehorning of cattle, sheep and goats. The science is clear that these are acutely painful procedures that violate New Zealand's commitment to the Five Freedoms, specifically freedom from pain and distress. For the same reason, I strongly support the prohibition on the hot branding of any animal.
2. I urge the Ministry to extend the pain relief requirement to all acutely painful procedures performed on farm animals. This includes the castration of cattle, sheep, goats, and pigs, the teeth clipping and tail docking of pigs, and the de-beaking of layer hens. The science is also clear that these procedures produce acute pain and thus violate one of the Five Freedoms.
3. While additional regulation of the live export trade is overdue, the government should suspend the trade entirely unless it can prove that live exporters can maintain standards equivalent to those in New Zealand both during transport and at the destination. Right now that is not the case. Australia's example — where Australian cattle and sheep have repeatedly died at sea and been slaughtered in inhumane conditions in foreign abattoirs — suggests that New Zealand should exercise far more caution before resuming the live export trade.

I am happy for these comments to be public and on the record, and am happy to answer any follow-up questions you may have.

Yours sincerely,  
Lewis Bollard

s 9(2)(a)



✓ / (620)

**From:** Bibby Raebell s 9(2)(a)  
**Sent:** Friday, 13 May 2016 6:13 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal welfare

Could you please also look to the complete phasing out of cruel practices involved in disgusting factory farming as a whole..all animals horribly treated in this most abominable unnatural practice. Battery and colony cages, farrow crates, overcrowding of cattle, pigs, sheep, lambs etc, infliction of unnecessary distress, fear, pain, abuse and neglect..these are all living, breathing, sentient beings who deserve humane treatment.

Please also ban rodeos, another anathema, and the use of cruelly trained animals in circuses.

We need a genuine separate ministry of animal welfare. Please show you truly care about animals.

Thank you.

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1



**From:** Bibby Raebell s 9(2)(a)  
**Sent:** Friday, 13 May 2016 5:44 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal welfare

**Categories:** Green Category

Animal cruelty is abhorrent. Please, we need you to do a full review and ban on all forms of animal welfare. To ban whipping about a horse's head, for example, is ineffective when it can be whipped anywhere else, therefore ban ALL whipping! Live export for any reason must be banned. Colony cages are as cruel as battery cages, the overcrowding of animals must be banned in all situations. Crammed, filthy "living" conditions, castration without pain relief, tail docking...there are so many loopholes that must be closed, if you really want us to be a nation of genuinely high animal welfare. It is time to be actively strict on ensuring only high standards, not the bare minimum. And please allow Farmwatch, Safe, SPCA & other animal welfare agencies are allowed more funding & authority to enforce them. Thank you

( aewyn Cowie

**From:** s 9(2)(a)  
**Sent:** Sunday, 15 May 2016 7:38 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** MPI Proposed Animal Regulations

**Categories:** Green Category, Blue Category

Proposal 13: Goat tethering

*Prohibit the permanent tethering of goats!*

Proposal for the transport of live animals from NZ:

*Stop terrorizing the animals and keep the jobs here!*

Proposals 17-19

*Prohibit the use of cages in the poultry industry! Intensive factory farming is appalling and a hideous  
le of NZ that  
the 'clean green' image keeps hidden.*

Proposal 25:

*Min floor lying space of  $0.03 \times LW^{0.67}$  /pig (m<sup>2</sup>) 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 near 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/m<sup>2</sup> 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.

Proposal 27. Pigs : size of farrowing crates

*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).*

Proposal 29 - Rodeos

*Ban this cruel sport!!!!*

●  
Proposal 48 - Transport of livestock

*Transport only so long as it takes to get to the nearest abattoir and allow room for animals to display normal behavior  
as well as space to lie down!*

Proposal 67 Cattle and sheep- Castration and shortening of the scrotum and 70 Sheep Tail Docking

*Administer long-acting pain relief at the time of the procedure and prohibit the use of rings in lambs and cattle over 6 weeks old.*

Please DO THE RIGHT THING!

S B

*Love changes everything...*

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622

To the Ministry of Primary Industries,

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

New Zealand legally recognises animals as sentient beings and in doing so accepts that they feel pain and are capable of feeling and showing emotion. Any practice that causes animals to suffer like live exports, colony cages, farrowing crates, confining animals in captivity and depriving them of their freedom and ability to display their natural behaviours and forcing animals to 'perform' on command for entertainment is a breach of their rights and causes unnecessary pain, suffering, torment and anguish.

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 (and the world as a whole). Extensive/factory farming is one of the biggest contributors of pollution, polluting water ways (rivers and lakes) and the air by releasing compounds such as nitrogen, sulphide, ammonia and methane.

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 being kicked, poked and the use of 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

Sam Chapman

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Out of Scope

**From:** Ammie Christiansen s 9(2)(a)  
**Sent:** Monday, 16 May 2016 7:57 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations  
**Attachments:** Animal Welfare proposed regulations feedback submission form (1).docx

Please find attached my submission to the proposed animal regulations

Ammie Christiansen

s 9(2)(a)

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## Animal Welfare proposed regulations feedback submission form

Ammie Christiansen

s 9(2)(a)

To Whom it May Concern:

I include my feedback regarding the proposed changes to the Animal Welfare Regulations. I appose changes regarding dog tail docking, dew claw removal and the use of prong collars.

I am a member of the New Zealand Kennel Club (NZKC) and an owner of registered pedigree dogs and a dog trainer at my local dog obedience club.

### My feedback:

*62. The proposed regulation states: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.*

*Must only be performed for therapeutic reasons*

*Pain relief must be used at the time of the procedure.*

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

I advocate and support the work of the accredited members from the New Zealand Council of Docked Breeds (NZCDB). Their skills and animal husbandry skills have been signed off by a veterinarian, who must complete their application for accreditation by either witnessing neonate puppies being banded or being in the presence of another accredited bander to ensure a proper & safe tail shortening is performed.

The NZCDB as an organisation was established in 2004 and the membership is focussed on the welfare of tail shortened breeds. They operate as a fully audited and regulated group under the umbrella of the NZKC with the approval of the National Animal Welfare Advisory Committee (NAWAC).

Since 2005 the NZCDB have performed tail banding to over 10,500 neonate puppies and to the best of my knowledge and understanding this has been without incident.

I am of the understanding that the procedure of tail banding (described by the NAWAC approved scheme) is vastly different from the process of tail amputation. As an owner of a docked breed I only support the use of an accredited bander performing the tail banding procedure under the Animal Welfare Act (No2) 2015 which is not a surgical procedure.

The breeds that I am associated with are traditionally docked dogs that still perform their duties that they were designed for.

I understand that in 2012 NAWAC agreed and suggested a study should be completed to dispel any myths around the process of tail banding, yet to date, this has not been carried out by NAWAC so I am surprised that this proposal has taken shape.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

I understand that over 170 countries do not ban the tail shortening procedure however these countries are not spoken about in any documentation produced by MPI.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for tail shortening.

I am of the belief that there is currently a process in place for the SPCA to act on individual cases that perform a tail shortening procedure illegally on a litter of non-registered NZKC members neonate puppies, however in the last 4 years I only know of 2 cases where the SPCA has acted on this information.

*61. The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:*

*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*

*Hind limb dew claws: non-articulated (greater than or equal to four days of age)*

*Must be performed by a veterinarian or veterinary student under supervisions; and*

*Pain relief must be used at the time of the procedure.*

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

When performing a dew claw removal, this process is completed on a neonate puppy 4 days of age or under. At this time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

No other country in the world has proposed this procedure should not be practiced as the health and welfare of the dog will be compromised.

collar tightens giving momentary discomfort to the dog, the second the dog falls back into line and is not pulling the pressure self releases removing any pressure and discomfort from the dogs neck.

I agree, prong collars should not be made available for general public sale. Prong collars should only be made available through consultation with an experienced dog trainer who would offer suitable training and guidance on how to use said training tool. I propose register of prong collar users be envoked and be administerd by an organisation such as the NZKC. Along side the register I propose that the sale of prong or pinch collars be restricted to only through a recognised organisation such as the NZKC and by application only as to why a handler by need to use a prong collar, to ensure proper supervision and training is sort.

As a domestic obeidence instructor, our club specialise in domestic training and although very few dogs we train would ever need a prong collar I think it is unfair to remove this as a viable training tool if needed for extremely difficult dogs. These training tools are extremely effective particularly when tiny handler/big strong dog combinations are had.

I agree, prong collars should never be left on a dog unsupervised and a dog should never be tied or teathered up while wearing a prong collar.

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As a dog lover and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and the dew claw if left on would result in significant pain and suffering to the dog.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for dew claw removal.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

As a domestic dog trainer and dog owner I have witnessed incidents of dew claws being torn off or catching and ripping the dogs skin or having the nail growing back into the skin of the dog as the pet owner did not understand how to trim the nails and often as the dog is of a coated variety, they are not aware of a dew claw being present.

I understand that not all front dew claws are articulated and once again the breed specifics have been ignored in this instance and MPI have been advised incorrectly.

I fail to see how removing a neonate puppies dew claws is any different to performing procedures to rectify a tongue tie on a young baby. Both are a quick and simple procedure which when performed can alleviate issues moving forward.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only – NZKC) have also not been included in the proposal to not allow this process to remain as is.

*4. The Proposed Regulation States: Prohibit the use of pinch and prong collars.*

*Proposed change to definition: A collar with prongs positioned against the neck, or an other protrusion intended to cause pain or discomfort when tightened.*

I disagree with this proposal in its entirety and advocate for the status quo and the proposed changes be reconsidered and these are my reasons:

Prong collars serve as a useful training tool for difficult and strong willed dogs. Where all other reasonable training means have been exercised I do not believe it is unreasonable to equip the handler of said dog with suitable means of controlling their dog under the guidance of an experienced dog trainer.

Prong collars when used correctly are a very effective behaviour modification aid placing the dog in control of their own destiny. If the dog chooses to forge out of position or pull on lead then the

**From:** Taylah Findlay s 9(2)(a)  
**Sent:** Monday, 16 May 2016 7:56 p.m.  
**To:** Animal Welfare Submissions  
**Attachments:** AnimalWelfareproposedregulationsfeedbacksubmissionform.pdf

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Animal Welfare proposed regulations feedback submission form

Name Taylah Findlay

s 9(2)(a)

My feedback: I feel that Tail docking and dew claws shouldn't be banned because docked breeds that are used for working eg hunting etc can easily rip their dew claws in the bush and sometimes when your so far out in The bush and a dog rips the dew claws it bleeds out which also means you won't have enough time to get the dog to the vet which also means dog dies! A lot of dogs possibly will start to die if it's banned for that reason! Also tail docking? Why banned something that's always been allowed or that's going to upset so many breeders? Or even help breeds choose to stop breeding which means the less breeders the less dogs I. The ring which also means good bye dog show world! All this is only going to ruin the dog show world! I have heard multiple breeders say they are going to stop breeding if this gets banned! Having a vet do docking? This can sometimes be even worse because some vets haven't a clue what they are doing even if they have done the qualifications

62. The proposed regulation states: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

Must only be performed for therapeutic reasons

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

I am a member of the New Zealand Kennel Club (NZKC) and am a registered breeder of pedigree dogs.

I am an accredited member of the New Zealand Council of Docked Breeds (NZCDB) and have had my animal husbandry skills signed off by a veterinarian, who must complete my application for accreditation by either witnessing neonate puppies being banded or being in the presence of another accredited bander to enable me to perform tail shortening.

The NZCDB as an organisation was established in 2004 and our membership is focussed on the welfare of tail shortened breeds. We operate as a fully audited and regulated group under the umbrella of the NZKC with the approval of the National Animal Welfare Advisory Committee (NAWAC).

I have never had a complaint or issue arise from any litter that I have completed banding on and to the best of my knowledge I understand that as an accredited group, we have performed tail shortening on over 10 500 neonate puppies without incident since 2005.

I am of the understanding that the procedure of tail banding (described by the NAWAC approved scheme) is vastly different from the process of tail amputation and as an accredited bander I only perform the tail banding procedure under the Animal Welfare Act (No2) 2015 and this is not a surgical procedure.

The breeds that I am associated with and that are banded by me are traditionally docked dogs that still perform their duties that they were designed for.

I understand that in 2012 NAWAC agreed and suggested a study should be completed to dispel any myths around the process of tail banding, yet to date, this has not been carried out by NAWAC so I am surprised that this proposal has taken shape.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

I understand that over 170 countries do not ban the tail shortening procedure however these countries are not spoken about in any documentation produced by MPI.

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I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for tail shortening.

I am of the belief that there is currently a process in place for the SPCA to act on individual cases that perform a tail shortening procedure illegally on a litter of non-registered NZKC members neonate puppies, however in the last 4 years I only know of 2 cases where the SPCA has acted on this information.

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Must only be performed for therapeutic reasons; and

Pain relief must be used at the time of the procedure

Hind limb dew claws: non-articulated (greater than or equal to four days of age)

Must be performed by a veterinarian or veterinary student under supervisions; and

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

When performing a dew claw removal, I complete this process in a neonate puppy 4 days of age or under. At this time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

No other country in the world has proposed this procedure should not be practiced as the health and welfare of the dog will be compromised.



As a professional dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and the dew claw if left on would result in significant pain and suffering to the dog.

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In my profession as a Groomer/Boarding Kennel facility I have witnessed many incidents of dew claws growing back into the skin of the dog as the pet owner doesn't understand how to trim the nails and often as the dog is of a coated variety, they are not aware of a dew claw being present.

I understand that not all front dew claws are articulated and once again the breed specifics have been ignored in this instance and MPI have been advised incorrectly.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only – NZKC) have also not been included in the proposal to not allow this process to remain as is.

625

**From:** margaret crichton s 9(2)(a)  
**Sent:** Monday, 16 May 2016 7:52 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations'

I totally support the banning of tail docking on dogs. As a breeder and dog trainer, I know how important it is for a dog to have its tail to communicate effectively with other dogs and humans.

**Margaret Crichton**

s 9(2)(a)

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626

**From:** Karen Baker s 9(2)(a)  
**Sent:** Monday, 16 May 2016 7:41 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** submission  
**Attachments:** IMG\_0002.jpg; IMG\_0001.pdf; IMG.pdf

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Animal Welfare proposed regulations feedback submission form

Name – Karen J Baker

s 9(2)(a)

My feedback:

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I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

I am a member of the New Zealand Kennel Club (NZKC) and am a registered breeder of pedigree dogs.

I am an accredited member of the New Zealand Council of Docked Breeds (NZCDB) and have had my animal husbandry skills signed off by a veterinarian, who must complete my application for accreditation by either witnessing neonate puppies being banded or being in the presence of another accredited bander to enable me to perform tail shortening.

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Pain relief must be used at the time of the procedure

Hind limb dew claws: non-articulated (greater than or equal to four days of age)

Must be performed by a veterinarian or veterinary student under supervisions; and

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

When performing a dew claw removal, I complete this process in a neonate puppy 4 days of age or under. At this time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

No other country in the world has proposed this procedure should not be practiced as the health and welfare of the dog will be compromised.

As a professional dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and the dew claw if left on would result in significant pain and suffering to the dog.

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In my profession as a Groomer/Boarding Kennel facility I have witnessed many incidents of dew claws growing back into the skin of the dog as the pet owner doesn't understand how to trim the nails and often as the dog is of a coated variety, they are not aware of a dew claw being present.

I understand that not all front dew claws are articulated and once again the breed specifics have been ignored in this instance and MPI have been advised incorrectly.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only – NZKC) have also not been included in the proposal to not allow this process to remain as is.

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**From:** worralnb s 9(2)(a)  
**Sent:** Monday, 16 May 2016 8:16 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Factory Farming

*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.*

✓ (624)

**From:** Annie Whiteside § 9(2)(a)  
**Sent:** Tuesday, 17 May 2016 3:56 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Feedback on new young calf management proposals

**Categories:** Blue Category

To the Minister / Ministry for Primary Industries

I fully support the SPCA in their belief of;

• not transporting bobby calves before they are 10 days old • not confining bobby calves for more than two hours while awaiting transport • providing proper bedding for bobby calves while awaiting transport • providing proper bedding for bobby calves during transport • ensuring better and more humane methods for loading and unloading bobby calves. Throwing animals is totally unacceptable • limit the time and distance bobby calves are transported and drivers must drive with respect and care for these and other animals • if a bobby calf is to be murdered, do it quickly on the day of transport

In addition I strongly urge for the appointment of a Minister for Animal Welfare.

Best regards  
Annette Whiteside

Sent from my iPhone

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**From:** Jan Read s 9(2)(a)  
**Sent:** Monday, 16 May 2016 7:11 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** 'Submission on Animal Welfare Regulations'  
**Attachments:** Animal Welfare proposed regulations feedback submission form.html

I am attaching a written submission on the Animal Welfare Regulations.

Jan Read  
Derringer Dobermanns  
derringer-dobes.com

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Animal Welfare proposed regulations feedback submission form

Jan Read of Derringer Dobermanns

§ 9(2)(a)

My feedback:

62. The proposed regulation states: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

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I am a member of the New Zealand Kennel Club (NZKC) and am a registered breeder of pedigree dogs.

I am not an accredited docker but have all my dog's tails banded by an accredited member of the New Zealand Council of Docked Breeds (NZCDB) who have animal husbandry skills signed off by a veterinarian, who must complete their application for accreditation by either witnessing neonate puppies being banded or being in the presence of another accredited bander to enable to perform tail shortening.

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As a professional dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and dew claw if left on would result in significant pain and suffering to the dog.

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I understand that not all front dew claws are articulated and once again the breed specifics have been ignored in this instance and MPI have been advised incorrectly.

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**From:** Jan Read s 9(2)(a)  
**Sent:** Monday, 16 May 2016 4:21 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** 'Submission on Animal Welfare Regulations'

In reference to submission re animal welfare:

- I agree that dogs should be secured when travelling on the back of vehicles on public roads for safety reason.
- I also agree on dog showing signs of heat distress from being left in a hot vehicle, the person in charge of the dog will be liable for a fine.
- As to De-clawing all dogs I don't agree with this procedure because dobermanns who move so quickly can get dewclaws ripped so easily which is a major problem. When doing rehousing & rescuing dokes for 15 years the no of cases of having to surgical remove them once injured, they do not need them for balance or any reason.
- As to banning tail docking of dobermanns I feel this breed was a man made dog therefore the natural tails are all different some bent in areas, also there being no standard for the size & type of tail means that the breed will all have so many different sized tails some long some thick. They do not use the tail for balance and in some countries have noticed the increase in Wobblers which is a degeneration of the spine with the extra weight of the tail putting a lot pressure on the spine. I actually left a tail on one pup for a owner it was terrible experience it kept getting caught especially when young as it could not hold it up being so heavy, it got damaged as well plus it did change the dog temperament he was very quiet not outgoing like the rest. Also as tails are banded at 2 days there is no pain in the endings of these tails which means they are not distressed at all, so not cruelty to them. I also feel with lambs being allowed to be banded who go into huge amount of pain over a week or so before the tail falls off is far more cruel and yet this has not been considered by the Welfare Act to ban at all.

Jan Read  
Derringer Dobermanns  
s 9(2)(a)

**From:** Beck Henderson s 9(2)(a)  
**Sent:** Monday, 16 May 2016 6:59 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Put factory farming on the agenda

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,  
Rebecca Henderson  
Tax payer of NZ

631

**From:** Gillian Burrough s 9(2)(a)  
**Sent:** Monday, 16 May 2016 6:54 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

In regard to the Animal Welfare Regulations released for Consultation in April 2016 I wish to submit the following:

I request that a thorough review of this country's farming practices be made, especially in relation to the fact that it is law in New Zealand that animals must be allowed to express their natural behaviour. There are still several areas in the farming industry which are in breach of this law, for example the use of colony cages and farrowing crates.

I feel very strongly that changes still need to be made to our animal welfare policies, not just for the sake of animals but for the sake of New Zealand. Around the world now people are becoming more and more concerned about how their food is produced. As an agricultural nation we need to have an impeccable reputation.

Thank you.

Gillian Burrough

s 9(2)(a)

s 9(2)(a)



**From:** Valerie Leppard s 9(2)(a)  
**Sent:** Monday, 16 May 2016 6:38 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Supplementary submission on Animal Welfare Regulations

Dear Sir/Madam

My submissions on your specific questions contained in the consultation document for the proposed animal welfare regulations are given below. I have followed your numbering system in my responses.

1. There is no reason to delay changes to the Act not yet in force; sooner is better.
2. The infringement fees proposed for sections 156I and 36(3) seem to me to be far too low. I would add a 0 to each figure to make them up to \$5,000 and \$3,000 respectively. You surely need flexibility to deal with repeat offenders or serious cases at a suitable level of severity.

The rather optimistic assertion that NZ has a world leading reputation seems to me to stem only from legislation in force, not actual good practice. The extraordinarily low number of farm animal complaints and infringements actually prosecuted seems to bear witness to this, given the millions of farm animals bred, handled and slaughtered in NZ. It is unlikely that many malpractices actually lead to consequences for the perpetrators in most cases.

I have personally never seen so many skinny cows before as I have since I came to live in NZ 2 years ago. I know the difference between dairy and beef breeds; both tend to look well-fed in the UK, based on my rural living in that country.

5. No

6. N/A

7. I do not think any industry should be self-regulating or allowed non-regulatory mechanisms; I am in favour of the use of regulations in all cases of animal welfare. The fact that up to 35,000 dairy cows were still subjected to abortions in 2015 is a shameful matter for NZ. Just stop it now. Electric goads should be banned, except where absolutely necessary to make an aggressive or stubborn human step away from any animal he/she is threatening. Use of goads at rodeos should be punished with jail time. Electric shock collars for dogs should be illegal. All muzzles should allow panting and drinking without exception. If 1080 were banned you wouldn't need nearly so many. The hypocrisy is stunning.

8. All disbudding should always be done under local anaesthetic with pain relief, with ear tags fitted simultaneously to minimise the stress and pain caused to the calf. No exceptions.

9. The infringement fees are far too low. All the proposals should attract higher fees, penalties and prison sentences where appropriate. Animal cruelty must be taken much more seriously than this because of the link between animal cruelty and subsequent aggression towards humans in multiple psychiatric analyses of human behaviours in society.

10. All animal cruelty should be prosecutable because of the potential danger to other humans described above. Routine animal cruelty is brutalising to the human psyche. Its normalisation by this process is very dangerous.

11. The regulations should certainly include provision for a mental element and psychological evaluation of perpetrators where appropriate.

12. Factory farming is intensive farming which will clearly lead to major regulation breaches all the time. This is because the permanent overcrowding and unnatural permanent housing of farm animals will always cause suffering and distress to animals prevented from expressing their normal patterns of behaviour. Farrowing crates for pigs,

colony cages for hens, and permanent indoor imprisonment for dairy goats are not compatible with any part of decent animal welfare. I fail to understand how this can be a defence under the Act.

13. Yes. Clearly stock handlers may be forced to hurt one animal to save it from the aggression of another animal, for example.

14. There is no reason not to make it an offence under the Act for farmers to place bobby calves in the grossly confining, inadequate pens of shame many of them have dumped at their farm gates. These pens are always too small for the sometimes extreme numbers of calves crammed into them and they do not provide adequate warm dry shelter for such very vulnerable youngstock. There is no reason why all farms should not keep bobbies on their farm premises in larger accommodation with appropriate bedding and regular milk feeds, enabling the farmer to supervise the loading of bobbies when the collection truck arrives and enters the farm premises. It should be wholly illegal to transport cattle without bedding in the transport vehicle to enable the animals to lie down in better comfort. No lead-in period is appropriate for this reform, which is decades overdue.

15. The codes of welfare should perpetually be raised to provide for much higher standards than hitherto exist; there must be an urgent cessation to the brutal treatment meted out to cattle, pigs, hens and goats and they must be fed sufficiently well to end the sight of skinny individuals being transported long distances in speeding, swaying, no-bedding trucks where animals are forced to lie on cold metal flooring for long travel journeys, or sweltering in overheated metal trucks with inadequate ventilation.

16. The approach adopted must aim to lift minimum standards into regulation as far as possible, retaining minimum standards to capture the widest possible intent. The second approach therefore seems more comprehensive. Ask yourself which you would prefer if you were a cow on her way to slaughter with a brutalised, untrained, unsupervised stock-handler wielding an electric goad in charge of your remaining hours of life.

17. You could amend the codes by empathising fully with the farm animals instead of the humans who exploit and kill them.

None of the codes is compatible with rodeos, circuses, many zoos, nor with greyhound and horse racing "sports" where animals are routinely abused and killed for human entertainment and money.

18. The stakeholders with the most to lose are the animals, and too few humans are willing to really speak up for them. Much animal cruelty is excused as being economically necessary in order for humans to turn a profit. This culture is ingrained in NZ society as the status quo. It's disgraceful. That people don't even know it's illegal to drown an animal is extraordinary. And hunters using bows and arrows? Are animals' deaths by bullet too quick for their tastes?

Colony cages for hens absolutely do not meet any proposed requirements for animal welfare. Layer hen stocking densities proposed under 18 would make a can of sardines look spacious. Wholly unacceptable.

The companion animals proposals in section 22 should equally apply to horses, cattle, goats, donkeys, pigs, sheep, deer as well as camelids. No-one should be permitted to keep an animal in solitary confinement.

Yours sincerely

Valerie Leppard

s 9(2)(a)

Tel: s 9(2)(a)

**From:** Valerie Leppard s 9(2)(a)  
**Sent:** Monday, 16 May 2016 9:10 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal regulations - Ministry of Primary Industries

Dear Sir/Madam

This is my submission on the regulations released for consultation in April 2016. Once again I note the unseemly "rush" to close opportunities for feedback so this reply is in haste.

What I actually want is for you to conduct a full and thorough (not rushed) review of factory farming in New Zealand as a whole, including in your review all the animals trapped indoors in permanent confinement. We should certainly not be regulating any practices which breach NZ's own Animal Welfare Act since this is a clear and present signal to all involved in animal industries to disregard the minimal animal welfare standards we have in place already. We should be looking into our future and creating a strong plan to ban all such breaches for ever.

I want you to remove the regulations you created for factory farmed animals, for example the ones allowing farrowing crates for pigs and colony cages for hens. Then I want you to set a date to review these cruel practices and all other factory farming practices.

Factory farming is abhorrent to most people, and New Zealand needs a quality strategy for phasing it out as soon as possible. Conducting a factory farming review will send a clear message to everyone involved in this industry to guide and inform their future investment, as well as giving everyone the opportunity to address this, the largest animal welfare issue facing New Zealand.

As an extension of this review you will surely also wish to ban rodeos as cruel outdated animal-baiting "entertainment" which has no place in the 21<sup>st</sup> century. The animals involved in rodeos will not "perform" until they have been goaded and distressed by totally unacceptable means, for example use of electric prods and flank straps, and inflicting rope burns, etc.

There is also the need for us as a nation to ban the use of all animals in circuses. There is ample evidence that these animals suffer in captivity, cramped confinement and excessive transportation, so there should be no reason whatsoever for us to allow that suffering to be continued for "entertainment" purposes.

Yours sincerely

Valerie Leppard

✓ 623

**From:** Jacqueline Liebenberg s 9(2)(a)  
**Sent:** Monday, 16 May 2016 6:20 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Review of factor farming

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.

Thank you  
Jacqueline Liebenberg

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**From:** Maralyn Crook s 9(2)(a)  
**Sent:** Monday, 16 May 2016 6:06 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Show the world we are leaders in animal welfare....as in so much else

*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.*

*Please, the world is watching.....*

*Yours sincerely,  
Maralyn Crook*

Sent from my iPad

✓ (635)

**From:** Mark Dawson s 9(2)(a)  
**Sent:** Monday, 16 May 2016 5:53 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare Act

To the Ministry of Primary Industries,

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

I would like you to conduct a full and thorough review of factory farming, including all 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 suggestion that aspects of rodeos are cruel. 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

Mark Dawson

s 9(2)(a)

[Redacted signature block]

*We are the largest circulating daily newspaper in the region. We boast a huge 32,000 readers daily Monday to Saturday and an impressive 33,000 on a Wednesday in our free community paper-Wanganui Midweek. Our circulation of the Wanganui Chronicle extends to South Taranaki, Rangitikei-Fielding, Waimarino-Central plateau.*



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✓ (636)

**From:** s 9(2)(a) and Shirley Wilshire s 9(2)(a)  
**Sent:** Monday, 16 May 2016 5:51 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** cattle dehorning

Kia Ora

I'm a farmer. I appreciate and strive to give my animals a fair deal. I recognize it is hard to balance/mitigate financial survival with the additional veterinary/animal welfare costs.

I would like to submit that: There needs to be more transparency and accountability for farm animal practices and welfare, as the guidelines are not always followed. eg...

Dehorning of calves, even if performed within the legal boundaries, is frequently not successful and the horns re-grow. As adult cattle, horns are often 'tidied up', with no anesthetic. This needs to be addressed. (The sounds emitted from cattle during this process would horrify the meat eating world via social media.)

#### Farm Dogs

Accountability for housing and treatment is falling short. I observe this regularly.

This is the tip of the proverbial iceberg, but I doubt that you will read any more.

I strongly feel that the future of farming, "going forward" is to lead the world in animal welfare if we are to produce animals with the sole purpose of being eaten up.

Yours sincerely,  
Shirley Wilshire

s 9(2)(a)

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**From:** Shirley s 9(2)(a)  
**Sent:** Friday, 13 May 2016 9:15 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Factory farming

Kia Ora.

Factory farming should be banned.

Shirley Wilshire

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(637)

**From:** Stephen Andrews s 9(2)(a)  
**Sent:** Monday, 16 May 2016 5:42 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 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.*

Thank you,

Sent from Planet Earth

**From:** Liz C-H § 9(2)(a)  
**Sent:** Monday, 16 May 2016 5:33 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare Submission

*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.*

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*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.*

*Please consider these issues, as they are of huge importance to the future of our agriculture sector.*

*Elizabeth Fouhy*

639

**From:** Emma Darby s 9(2)(a)  
**Sent:** Monday, 16 May 2016 5:23 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Please ban factory farming!

*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.*

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*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.*

*Thank you,  
Emma Darby*

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**From:** Kelsey Hayward s 9(2)(a)  
**Sent:** Monday, 16 May 2016 4:36 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

To Whom It May Concern

I would like to make a submission regarding animal welfare.

It states on the submission page that New Zealand's animal welfare systems are amongst the best in the world.

I would like to think that this is true. I would like to think that New Zealand, which apparently is a great, safe place to live, has some of the best animal care regulations.

We were among the first countries to give women the vote, to legalize same sex marriages, to do things that other countries frown upon.

We seem to be above the game. We seem to understand that everyone is allowed a voice, and the right to personal freedom.

So why does this not apply to our animals?

I know the majority of these new regulations are mainly focused around bobby calves after that horrendous video footage was released.

Fair enough. The media apparently blew it out of proportion they say, however no one can deny it doesn't happen in some of our dairy farms.

That kind of torture needs to end – and end quickly. The people responsible clearly have no compassion, and they need to be dealt with – properly.

However in my rant today I would like to discuss dogs. Dogs dogs dogs. In Hamilton mainly, but I am sure these problems happen all over the country.

I live in Nawton, Hamilton. A great place to live if you enjoy seeing neglected dogs everywhere.

Dogs have ridiculous laws in NZ. The problem is there are no laws. Or no one seems to be upholding them.

Anyone is allowed a dog.

Anyone is allowed two dogs (in Hamilton. Not sure about other cities?)

However to own 3 or more dogs, THEN you need a permit, neighborly permissions, inspections, etc.

Why are these kind of rules only applied to 3 or more dogs?

Owning a dog is a huge responsibility. Too many people get dogs without thinking about the long term. Why aren't these kind of rules applied to anyone who wants a dog?

Not everyone should be allowed dogs. Just like not everyone should have children.

Call me horrible, but I do not stand by political correctness. I live in the real world. And where I live I see too many dogs owned by people that should not own a dog. Or a pet, full stop.

I guess there is the problem of funding and lack of man power. Or a lack of caring.

MPI and the SPCA help each other, I am told. Is MPI aware that the Hamilton SPCA is terribly run? They are supposed to care for lost, injured, neglected dogs. What a joke.

I have lived in my house for nearly three years. I have found several strays. Come across several starving dogs.

My first call to the SPCA went something like this:

I found an injured dog whilst out at the local supermarket. It was late, and he was just roaming the streets, about to get hit by a car.

The SPCA would not take him. They told me to take him back to where I found him and let him go. Right.

Fortunately, I did not take their advice. He was old and lost. I'm sure the next time I went to the supermarket and saw his body lying on the road I would have felt great about that decision.

Instead, I took him home for the night, and went out of my way to find the owner. What would have happened if I hadn't of cared?

The second time, I found a pair of dogs running in the streets. I caught one as it was a puppy, skinny, but friendly.

The second one was aggressive and limping.

The SPCA, lo and behold, did not want to know. They ended up in the pound. The puppy was put to sleep. The second one was released back to its owners.

The third time, I called them to let them know of a skinny dog that was eating its leash. They went and looked at the dog.

They called me afterwards. They agreed the dog was too skinny. The owner told them they were working dogs. They said in that case, the dog is allowed to be skinny.

The fourth time, was about a chained dog next door. The owners regularly beat up the dog. It gets tormented by kids. It got attacked by two other dogs.

The SPCA did not call in to check on this dog. They said they would. But they never bothered.

Which brings me to another point where New Zealand fails its dogs.

Chaining. If we really are a national that cares for its animals, why are dogs allowed to be chained up?

Dogs are social, intelligent creatures. No dog deserves that kind of life. It's not a life. It's a prison sentence.

The dog mentioned above is chained 24/7. No human interaction. She is highly aggressive. She barks all day long because she has nothing else to do. She has no proper shelter (SPCA was informed of this).

She is purely a guard dog. When she misbehaves, she gets beaten up. But because they feed her, the SPCA will not bother checking the welfare of this dog.

The rule is 15 minutes a day off the chain. What a ridiculous rule. One, it doesn't happen, and two, 15 minutes in 24 hours?

Any sane, normal person should agree that this is cruel. What kind of a sad life these dogs have.

These poor, neglected creatures. Who will help them? I have tried. The SPCA, the pound, local rescues. No one wants to do anything.

I hate to think how many dogs in this country suffer this kind of life.

I have two dogs. They are my life and I therefore cannot understand some people.

I have thought about reaching out myself, to talk to these people, to make some suggestions.

Where I live though, my input would not be welcomed, and retaliation is a huge possibility.

So who then? When those who are supposed to help refuse?

Where are the laws that prevent this kind of mistreatment? Who writes the laws explaining the definition of mistreatment, and who upholds the rules?

Well I came across the page that was asking for input. Here is mine.

In light of the constant dog attacks reported.

In light of what I see on a daily basis.

In light of what I constantly hear.

We need to do something.

Dogs should not be readily available to anybody.

Dogs should not be chained 24/7.

More education is needed on dog ownership and responsibilities.

We need to get serious. Nothing gets done. Nothing changes. The cycle continues.

When will someone in a position that can actually make a serious change – actually make a change?

One thing is clear – nothing is changing currently. If anything, it all seems to be getting worse.

So what, as New Zealanders, one of the best in the world, are we going to do about it?

Thank you,

Kelsey Hayward

✓ (641)

**From:** Sue Harishun s 9(2)(a)  
**Sent:** Monday, 16 May 2016 4:09 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Review of factory farming

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.

Sent from my iPhone

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**From:** Jo Macdonald s 9(2)(a)  
**Sent:** Monday, 16 May 2016 4:04 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** No cages and crates

**From:** SAFE <admin@safe.org.nz>  
**Reply-To:** SAFE <admin@safe.org.nz>  
**Date:** Friday, 13 May 2016 at 5:17 PM  
**To:** Josephine Macdonald s 9(2)(a)  
**Subject:** One week to have your say!

*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.*

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*Finally, I would like 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.

*Thank you,*  
Jo Macdonald

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643

**From:** Erin Thomson s 9(2)(a)  
**Sent:** Monday, 16 May 2016 3:59 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

My contact details are  
Erin Thomson

s 9(2)(a)

I want to see all the recommendations made by the SPCA for the treatment of animals in all areas of animal welfare brought into law.

We have to we musts top treating animals as lesser beings, they are creatures with feelings, emotions, relationships and deserve so much more than we give them.

I know future generations will look back on our times and our treatment of animals and environment with horror.

We need to act now!

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644

**From:** Robyn Fond s 9(2)(a)  
**Sent:** Monday, 16 May 2016 4:11 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Respect and Welfare for ALL animals!!!!

*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.*

*Thank you,*

Robyn Fond

1 (645)

**From:** The Harts Online s 9(2)(a)  
**Sent:** Monday, 16 May 2016 3:53 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission Opposing Factory Farming

*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.*

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*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.*

*Regards,  
Karen Hart*

s 9(2)(a)

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**From:** Michael Wauters s 9(2)(a)  
**Sent:** Monday, 16 May 2016 3:39 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** My Submission

*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.*

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*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.*

Regards,

Michael Wauters  
s 9(2)(a)

**From:** Ursula Edgington s 9(2)(a)  
**Sent:** Monday, 16 May 2016 3:23 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

With regard to the above, I would like to highlight the following:

The proposals do not include wild-animals - and the concern for humane treatment should not be solely limited to animals considered broadly as 'cattle', 'pets'. There is no logic to this. I firmly believe that deliberate harming and/or inhumane killing of ANY animal - whether defined as wild or other - should be prohibited under the NZ laws - as in other developed countries.

With regard to other issues mentioned in the proposals:

5. Dogs – Injuries from collars or tethers. :

Proposal: Use of a collar, and/or a tether, must not cause cuts, abrasions, swelling, restrict breathing or panting.

**Dogs suffer in NZ because it is an odd but accepted cultural norm to have dogs tethered outside a house 24/7.** This is totally unnecessary for any residential property in the 21st century when modern alarm systems and CCTV could be used for security purposes. Dogs are social animals and should NOT be locked outside and alone without access to human or animal contact. It is inhumane and NZ law needs to begin to change the outdated, cruel practice. See the the charity [cdanz.org](http://cdanz.org) for details of this horrific behaviour and its effects on the dogs.

also:

9. Dogs on moving vehicles on public roads must be secured in a way that prevents them from falling off, except for working dogs which may be unsecured on a vehicle while working. **All living animals** need to be securely and safely transported. Clearly, tethering them to the back of an open-top ute is NOT acceptable - either for the humane treatment of the dog - or for the safety of others around the vehicle when it has come to a stop. This practice is again out-dated from agricultural practices and needs to be banned outright.

Thank you for reading my submission

Regards

--  
Dr  
Ursula  
Edgington

s 9(2)(a)

Independent Writer and Researcher

Academic Profile/Publications

Employment networking

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Out of Scope

**From:** Ian Geddes-Cook s 9(2)(a)  
**Sent:** Monday, 16 May 2016 3:52 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** 'Submission on Animal Welfare Regulations'  
**Attachments:** banding sub.pdf

Hi There

I would like to make a submission: on Animal Welfare Regulations re tail banding and removal of dew claws.

- Individual submission: Member of NZKC & Council for Docked breeds.  
Registered tail banding, with 30 yrs. experience with owning showing and breeding dogs. Experience with animal husbandry/managing farm livestock.

Regards,

Ian Geddes-Cook  
Hardrada Kennels

s 9(2)(a)

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Date 16/5/16

To whom it may concern

Becky Nzkc & MPI

## **ANIMAL WELFARE (DOGS) CODE OF WELFARE**

### **MPI Tail docking and dew claws – Submission**

Ian Geddes-Cook Nzkc Member s 9(2)(a) Council of docked breeds member –

#### **Statement**

I have been breeding dogs and tail banding dogs and other farm animals for 30 years. In that time I have never had any management issues requiring vet attention for dogs, or other animals banded, or who have had removal of dew claws.

In New Zealand I feel we already have robust standards in place when it comes to tail banding and dew claws, and other farm animals. My concern as a breeder and farmer is that changes to the law are being requested. I would like the following issues and concerns to be issued as I feel there is a need for more research, and a greater consideration should also be made to any decisions made on the impact for not just dogs but other farm animals, I see any changes made that effect the current status quo will cause insurmountable future risks, yet I feel a balanced view should be considered. In recent years we have had demands to stop our current practice, yet we already have well regulated robust standards in place monitoring our current practice when it comes to tail banding and removing dew claws.

I would like the following points to be considered in my submission.

- Robust welfare standards in place by Nzkc, council of docked breeds and National Animal Welfare Advisory Committee ( NAWAC) these are regularly monitored and adhered too.
- As a paid member of Council of docked breeds, NZKC, our tail banding is carefully monitored, with adequate regulations already in place.
- Dogs are used in a variety of situations, guarding, and farming and hunting, I personally have my dogs for hunting and rounding up sheep on my farm, and think I would have more tail injuries if I did not tail band and remove dew claws- may be more research is required.
- I am a breeder/ farmer applying code of welfare in over 30 yrs have never had a complaint from council, vet NZKC regarding our animal husbandry issues, possibly more research is required around this.
- There's divided views on tail docking, should more research be undertaken, as NAWAC has suggested this in the past, little research in New Zealand, in many cases evidence around the docking or anti docking / dew claw issue is based upon anecdotal evidence in some instances, there's probably a need for good research.
- Lasting effects of tail docking, no research to confirm that it causes any long term effects.
- Nervous system's not developed when pups are banded.
- Vets complain about tail docking, yet accredited tail banders do not cut tails, tails are banded, as this is the preferred method and now law
- Uk research shows increase in tail injuries since docking was band, no research in new Zealand – this should be considered
- We have never had a pup taken to vets for problems for tail banding in over 30 yrs, vets do health checks on all our puppies. We have never had any vet documented any problems

with the docked tail, or dogs that have had dew claws removed. No documentation or reports from vets re infection, pain, this should be researched

- Dew claws and tail banding are done to prevent injury when a large working dog gets older, the treatments as a few day old pup is significantly less then what a dog will need to go through as an injury, we have on the farm , in the bush, our dogs help protect the property and round up sheep and cattle.
- **Research states banding is not painful** on 204 day old pups Diesch et al 2007 theres a need for updated research in New Zealand
- Diesh et al 2009 EEG study in rates shows no pain activity when tails are clamped, should same studies be funded for puppies?
- **Vets base pain on surgery docking not on banding method NOONAN ET AL 1996 B**
- Vets dock surgically when it was legal with their governing body for years, some still would if they were allowed. As it's a personal choice even for a vet if given the opportunity.
- **Research shows injuries increase on tails once tail banding is banned Strejffet 1992. Have we any opposing research in New Zealand?**
- Working dogs suffer for having a tail in certain situations Limbar tail see steiss 1999 in water when swimming tail damage in adult dogs mercer 1992 peek 1995
- Research has shown that older dogs with tail damage have
  - Significant pain
  - Expensive surgery
  - Problematic for good recovery
  - Leads to amputation
  - Delayed healing
  - Owner unable to afford vet bills
  - Dogs more readily get euthanized
- **Lee et al 2004 noted more health concerns for breeds that have traditionally been docked**
- **There's a big risk of breeders who want docked tails, who may breed for shorter tails, stumpy tails, bob tails, all these are added genetic faults which could harm our dog breeds further. The same is already occurring in sheep!**
- NAWAC has suggested more research into tail banding and its effects, unfortunately this has not been done.
- If docking is banned has research been conducted into the increase of bob tails and spina bifida? Have there been an increase of these genetic faults, as more breeders overseas are stating that they have natural bob tail lines, will docking cause an increase of this in New Zealand? Breeding genetic abnormalities is potentially very concerning if docking is banned..
- Aa a dog breeder and farmer this is also a case of good animal husbandry and freedom of choice, if dogs are effected how will the regulations affect me in the future when banding or castrating my sheep, the same concerns can be expressed, so changes with the canine legislation will have a massive impact throughout the dog and possibly the farming community.
- 
- **The research details are on the National Animal Welfare Advisory Committee report into tail banding**

Regards

Ian Geddes-Cook

s 9(2)(a)

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** Luzelle Cockburn s 9(2)(a)  
**Sent:** Monday, 16 May 2016 3:18 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations  
**Attachments:** MPI Prong Collar Ban (2).pdf

Reply from Luzelle Cockburn from Solution K9

s 9(2)(a)

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TO WHOM IT MAY CONCERN:

**Regarding the proposal to ban prong collars**

Reply by Luzelle Cockburn dog trainer and business owner at Solution K9 based in New Plymouth, Taranaki. § 9(2)(a)

**Argument highlights for the use of prong collars:**

1. Safety - for fine built women or disabled persons with muscular or large dogs that can easily drag them into the road or cause shoulder injuries, being able to safely and humanely use a prong collar will prevent accidents, enable the dog to get walks and reduce ACC shoulder claims.
2. As a trainer, I like to use prong collars to teach a dog to respect a flat collar through leash pressure. I use the tool suited to the dog, but find especially that dogs that are used to pulling benefit from learning with a prong, and this leads on from point number one. A prong collar makes it clear that I am applying the pressure, and I can use as little pressure as necessary yet only as much as needed. I don't have to guess or fiddle with dials.
3. I have used a prong collar to help one of my own dogs: (this dog does not believe she will get the toy back after giving it up, so the prong is used slightly just to get her to release the toy so that she can see that she will get it back) <https://www.youtube.com/watch?v=2vD0Q3VWf7Y> (note the assistant in the video, was previously against the use of prong collars. She works as a dog groomer. However seeing the fair and humane use of a collar correctly applied changed her mind. Question: Notice how small the correction was on a prong collar... how hard would a correction have had to be on a different collar? Could such a hard correction cause damage through long term use?).

**Long argument**

As a dog trainer, I want to use the most humane method to train a dog. I want the best results for the dog, so I want something that will cause the least harm and give the best results. I am well versed in using force free training methods as well as corrective training methods. I strive to use the correct method for the correct dog.

I want to prevent injuries to the dog and the owner. Safety is my main concern as a dog trainer and so I choose the use of each tool or method carefully. I have requested information from MPI regarding collar injuries and ACC regarding injuries related to walking dogs. I would appreciate if this could be included for your consideration when the information comes through.

It is also important to note that the DOG determines what is aversive. As a dog trainer, I like to have a range of options available so I can choose the correct tool for the dog. As an example of this, I taught one of my dogs to stop barking, simply by picking her up - this solution is not one that will work for most dogs, yet it worked better than any other method I had tried (including a citronella spray collar)

Abuse causes lasting damage and injury. All of the below tools are useful for the correct dog and in the correct application and circumstances, yet all of them can be used to abuse a dog:

- Check chain - corrections can cause trauma to the neck.
- Halti - corrections can cause trauma to the neck.
- Front clip harness - restricts movement so use is questionable especially as a running aide.
- Electric collar - the dog may not associate the correction is from the handler, depending on the purpose of training, this can either be a positive or negative. Long term wear can cause pressure sores.
- Prong collar - Long term wear can cause pressure sores.

In my experience, people who want to abuse dogs will do so no matter which tool they use.

A German study comparing choke chains/slip chains to prong collars/pinch collars found the following (I cannot find the reference to the original study, so although the findings are relevant, the merits of this information needs to be taken at the reader's discretion):

- 100 dogs were in the study. 50 used choke and 50 used prong.
- The dogs were studied for their entire lives. As dogs died, autopsies were performed.
- Of the 50 which had chokes, 48 had injuries to the neck, trachea, or back. 2 of those were determined to be genetic. The other 46 were caused by trauma.
- Of the 50 which had prongs, 2 had injuries in the neck area, 1 was determined to be genetic. 1 was caused by trauma.

When talking to a European trainer, we discussed the Swiss laws banning training tools. The trainer explained that banning tools didn't result in more humane training. Trainers picked sticks and hit their dogs instead.

When dealing with a miss-matched dog and handler team where the owner is not strong enough to control the dog, we need to have tools available to the owner to be able to walk that dog. Often the dog was sourced as a puppy and the owner hadn't taught the dog loose leash walking from a young age. Removing people's options to help them to cope with their dog's difficult behaviour is not the answer.

I have recommended a prong collar to only one client. That client could not take her staffy cross for a walk without getting dragged around. She now no longer requires the tool. I have taught all my own dogs to respond to leash pressure with the use of prong collars. At ages 3 and 5 my dogs do not even need flat collars or leashes. I feel that it was a very useful and humane way to teach them and as I tend to have stronger willed, more difficult dogs, as I also breed puppies for the military, I'd like to continue using this tool.

When I first got into dogs, I was against the use of Prong and Electronic collars due to the propaganda I was exposed to. However, as a student of dog training, I decided to try these tools myself. I believed the propaganda that corrections made dogs aggressive (I learned better when I had a dog that started challenging me after I raised her positive only!). I actually found them to be beneficial for some dogs. As a trainer now, I recognise that not every dog needs training aides. However, some dogs do. Should we ban these dogs? NO! Where would the police and military source their pups from if these dogs are banned? They have a place in society. They are great dogs to own! And they are safe in the right hands.

But I would not place them with positive only/force free trainers. In my opinion and from my own experience, that is a recipe for disaster.

Prong collars are not in widespread use. Most people are already believing the propaganda against corrective tools. We could argue that that is part of the reason there is a rise in dog bites, however, I digress. I feel there is very little danger of people resorting to abuse by using prong collars (especially as tools are only worn for training). I have only met one other person in the whole of Taranaki who uses them (and she uses them humanely also)! There is no reason to ban the use of prong collars under experienced supervision or training.

I know of at least two dogs that were put to sleep because their owners were too permissive. The goal of a training tool is to ensure dogs live long, happy, stable, lives as well mannered pets.

Tools do not abuse dogs, humans do. It is up to dog trainers to educate clients on safe, effective and humane use of tools.

I do not want to see tools in widespread circulation as I feel dog owners require education before using any tool. However, I do not want to see any tool banned either. Every dog and owner team is different. As a dog trainer, I want to be able to use the tool best suited to the dog.

I think the current status of the prong collar is sufficient.

For further consideration:

<http://www.labadoption.org/info/file?file=17128.pdf>

Kind regards

Luzelle Cockburn  
Dog Trainer Solution K9

§ 9(2)(a)

✓  
(650)

**From:** Graham Cliff s 9(2)(a)  
**Sent:** Monday, 16 May 2016 3:15 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Proposed Animal Welfare Regulations (Care & Conduct and Surgical & Painful Procedures)

I wish to make a submission in this matter.

Name: Dr Graham Cliff, B.A.; M.Sc.; M.B., B.S.

Status: Private citizen

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

I not not wish to appear to speak to this submission.

My submission comprises general comments only; the specifics (and minutiae) of the proposed revision to regulations are, in my opinion, best left to veterinarians and others with appropriate expertise.

1. Under all circumstances, it is essential, for humane reasons, to ensure that any animal be kept under conditions which approximate the most closely possible to those of its natural, free environment. This would mean a cessation of "factory farming", as exemplified most egregiously by battery egg production, but also by colony cages for hens, or farrow crates for sows; the economic advantages of such inhumane practice cannot, in a society that likes to consider itself civilised, be allowed to outweigh the ethical imperative to do whatever possible to minimise the suffering of animals in captivity.
2. The timeline for phasing out these inhumane practices should be brief; delaying tactics by the food producers and others would be inevitable.
3. All entertainment activities that exploit the presence of animals should be banned; this would include, in particular, circuses, rodeos, and various parades, pageants and other sundry 'social' events. The rationale of this prohibition lies in the fact that none of this animal participation is in keeping with the animals' natural environment and/or behaviour. The exploitation of animals in rodeos, for example, is no more acceptable than the former practices of bear-baiting or cock fighting; it is no defence to argue that the animals "don't suffer" because that stance fails to address the artificiality of the created entertainment environment (it also makes some huge assumptions about the participant animals' states of mind).
4. The use of animals in scientific or medical experimentation must be kept to an absolute minimum, and monitored with the closest scrutiny. In these times of tissue culture and computer-generated modelling, the mutilation and/or



sacrifice of animals is far less necessary than it was, and the onus for justifying such intervention should be tightly imposed on the proposer(s).

5. It is my opinion that New Zealand could, were it so motivated, lead the world in the humane treatment of its animals, right across the board. We owe it to ourselves to aspire to this goal, for both ethical and pragmatic reasons; the time for delay and excuses has passed.

Graham Cliff

16 May 2016

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