

So my personal experience is that 100% of my dogs with dew claws have had to have these removed as adults...a long painful surgery requiring full anaesthetic and significant post operative treatment and care...and why...because the dew claws were not removed by an accredited person before they were four days old when the significance of the procedure and associated discomfort would have been minimal.

Again I ask that the committee consider this and maintain the option to remove dew claws by either a vet or an accredited person, as currently occurs with the tail banders.

There are a number of significant issues that the committee must consider in regards to Animal Welfare and I wish you all the best in the process, but please consider the welfare of all dogs, especially my beautiful Giants and allow us as breeders to have a choice acknowledging that we do so with due consideration for the welfare of the dogs we love and have guardianship for. I take my role and responsibility very seriously.

Thank you

Leanne McTear

Zauberei Giant Schnauzers

www.zaubereigiantschnauzer.weebly.com

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Out of Scope



1307

From: Barbara & § 9(2)(a) Hawker - Rampage Boxers § 9(2)(a)
Sent: Wednesday, 11 May 2016 7:27 p.m.
To: Animal Welfare Submissions
Subject: Feedback to Proposed Changes to Animal Welfare Code
Attachments: 2016 SIBC Animal Welfare proposed regulations feedback submission form.doc

Follow Up Flag: Follow up
Flag Status: Completed

To Whom It May Concern

On behalf of the South Island Boxer Club Inc please find attached our feedback submission in opposition to the proposed changes to the Animal Welfare Regulations with regards to dew claw removal & tail docking

Kind regards
Barbara Hawker
Secretary – South Island Boxer Club Inc

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Animal Welfare proposed regulations feedback submission form

South Island Boxer Club Inc on behalf of its members

Contact details – Secretary Barbara Hawker s 9(2)(a)

61. Dogs – Dew Claws

Removal of dew claws is generally done in the first 2-4 days after birth. It is a very quick procedure with the primary intention of removing the toenail and its bed. There is no need to remove bony tissue apart from the first section up to the end of the distal phalange that has the nail bed. Bones at this stage are still largely cartilaginous. Performed correctly there is no blood loss & the discomfort is minimal.

It is nonsensical to suggest that dogs without dew claws can't hold bones, toys etc.

Untrimmed dew claws curl round & dig into the dog's leg. Dogs that have caught their dew claws on things suffer a great deal more pain & owner distress than if it had been removed shortly after birth.

As dew claws are higher up the leg than the toes on the paw it would be very difficult for dew claws to provide support when running.

In our opinion leaving dew claws on a breed such as the Boxer would result in a large number of injuries and on-going events.

There is contradiction with the proposal that lambs can be docked under the age of 6 months by any person as a "preventative method" yet it is proposed that NZKC Registered breeders who have the best interest of the puppies they breed will not be able to perform a preventive procedure (articulated dew claw removal) on a newborn that has under developed pain receptors.

The proposed changes seem unnecessary when no evidence has been provided to suggest that there are issues associated with the status quo.

We propose a similar accreditation process similar to the NZ Council of Docked Breeds be implemented to provide accountability for NZKC breeders wanting to be given the freedom of choice to remove the dew claws from puppies under the age of four days old.

62. Dogs – Tail Docking

We dispute the argument that dogs require full length tails for balance & communication. Several of our Club members do agility with their docked boxers where they compete successfully at high levels in the sport. The structure of the dog creates the balance NOT whether it has a docked or an undocked tail. Dogs have many ways to communicate. The tail is only one of them some others include use of facial expression, use of the ears, lips, body posture, body position, actions such as play bowing and pawing, and use of erectile hairs on the neck.

The existing system overseen by the NZ Council of Docked Breeds (NZCDB) & NZKC is rigorous in its application and applies to all accredited banders and puppies banded. We believe backyard breeders need to be focused on not NZKC registered breeders banding in accordance with the NZCDB rules.

Banding of dogs' tails is not a surgical procedure & should not be considered as such.

The recognised procedure involves the placement of a ligature on the neonatal puppy's tail within 72 hours of birth by a suitably trained person. No pain or distress is caused. Puppies are born blind & deaf and unable to control their own elimination or temperature – even by shivering. Despite huge amounts of money spent by the supporters of this proposal, they have been unable to prove full nervous system development and therefore pain perception at this stage. If politicians and their advisers wish to be brave, and not hypocritical then they must ban ALL forms of invasive procedures in animals: the 30 million docked sheep, docking of piglets, neutering & spaying of cats & dogs. **Or is welfare of a species strangely tied to an economic consideration???**

The current proposal is for anyone to be allowed to dock lambs up to the age of 6 months to prevent fly strike, but they want to stop the banding of new born puppies tails by breeders experienced in the technique.

Each year lambs (that are far from being newborn) are drafted away from their mothers, their tails are removed by hot irons or tailing rings followed by the ensuing baaing & bleating as the lambs writhe around in pain on the grass. In contrast to an accredited bander who bands the puppies' tails at 24 – 48 hours of age - no pain or distress is caused while the pups continue to nurse from their mother.

We strongly believe that both dew claw removal and tail docking are preventative measures in some breeds due to the breed characteristics. The way boxers play. Their enthusiastic greeting and the lack of hair to act as a shock absorber predisposes them to tail & dew claw injuries.

If dogs were to provide economic benefit to the country like sheep, cows, pigs would our submission opposing changes be required Somehow we doubt it!!!

We oppose the introduction of the banning of the shortening of puppies' tails & contend that this is NOT in the best interest & welfare of the dogs & propose we continue with the status quo as approved by the Dogs Code of Welfare 2010.



1308

From: Sandra Meyer § 9(2)(a)
Sent: Wednesday, 11 May 2016 6:14 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare

Follow Up Flag: Follow up
Flag Status: Completed

I am no expert on animal welfare in New Zealand but I do know a country is judged on how they treat their elderly, their young and sick and their animals. New Zealand has come up very short on quite a few issues lately - crated pigs, caged chicken, bobby cows to name a few. Laws need to be made to send a message to those people who don't take animal welfare seriously. As a caring citizen I would hope the Ministry will consider the voices of the SPCA and other organisations who are involved with animal as new regulations are made.

Your sincerely,
Sandra Meyer

Sent from my iPhone

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✓ (1309)

From: Barbara & § 9(2)(a) Hawker - Rampage Boxers § 9(2)(a)
Sent: Wednesday, 11 May 2016 4:01 p.m.
To: Animal Welfare Submissions
Subject: Feedback to Animal Welfare Policy
Attachments: 2016 Animal Welfare proposed regulations feedback submission form.doc

Follow Up Flag: Follow up
Flag Status: Completed

To Whom It May Concern

Please find attached my feedback submission in opposition to the proposed changes to the Animal Welfare Regulations with regards to dew claw removal & tail docking

Kind regards
Barbara Hawker
Rampage Boxers

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Animal Welfare proposed regulations feedback submission form

Barbara Hawker

Member NZKC, Member & Secretary South Island Boxer Club, Member NZ Council of Docked Breeds, Breeder of pedigree Boxers for 20 years, Veterinary Nurse

Contact details - s 9(2)(a)

61. Dogs – Dew Claws

Removal of dew claws is generally done in the first 2-4 days after birth. It is a very quick procedure with the primary intention of removing the toenail and its bed. There is no need to remove bony tissue apart from the first section up to the end of the distal phalange that has the nail bed. Bones at this stage are still largely cartilaginous. Performed correctly there is no blood loss & the discomfort is minimal.

In my years of owning dogs that have had their dew claws removed I have never seen one having difficulty holding a bone or toy as it is their feet they use to hold objects not their dew claws.

In my years as a veterinary nurse I have witnessed numerous dogs that have had untrimmed dew claws curl round & dig into the dog's leg as well as dogs that have caught their dew claws on things causing a great deal more pain & owner distress than if it had been removed shortly after birth.

As dew claws are higher up the leg than the toes on the paw it would be very difficult for dew claws to provide support when running.

There is contradiction with the proposal that lambs can be docked under the age of 6 months by any person as a "preventative method" yet it is proposed that NZKC Registered breeders who have the best interest of the puppies they breed will not be able to perform a preventive procedure (articulated dew claw removal) on a newborn that has under developed pain receptors.

The proposed changes seem unnecessary when no evidence has been provided to suggest that there are issues associated with the status quo.

I propose a similar accreditation process similar to the NZ Council of Docked Breeds be implemented to provide accountability for NZKC breeders wanting to be given the freedom of choice to remove the dew claws from puppies under the age of four days old.

62. Dogs – Tail Docking

I dispute the argument that dogs require full length tails for balance & communication. I work in a veterinary clinic that treats numerous greyhounds (as racing dogs & retired family pets). Though not normally docked hundreds have had a portion of their tail removed due to the whippy nature of their tail being damaged. Many, many of these dogs have continued racing successfully. The structure of the dog creates the balance NOT whether it has a docked or an undocked tail. Dogs have many ways to communicate. The tail is only one of them some others include use of facial expression, use of the ears, lips, body posture, body position, actions such as play bowing and pawing, and use of erectile hairs on the neck.

The existing system overseen by the NZ Council of Docked Breeds & NZKC is rigorous in its application and applies to all accredited banders and puppies banded. Backyard breeders need to be focused on not NZKC registered breeders doing it through NZCDB properly with robust audit procedures. Outlaw the docking of specific dog breeds by qualified banders and watch for an increase in 'home jobs' undertaken by people mostly beyond the reach of the Authorities who are breeding for profit.

Banding of dogs' tails is not a surgical procedure & should not be considered as such.

The recognised procedure involves the placement of a ligature on the neonatal puppy's tail within 72 hours of birth by a suitably trained person. No pain or distress is caused. Puppies are born blind & deaf and unable to control their own elimination or temperature – even by shivering. Despite huge amounts of money spent by the supporters of this proposal, they have been unable to prove full nervous system development and therefore pain perception at this stage. If politicians and their advisers wish to be brave, and not hypocritical then they must ban ALL forms of invasive procedures in animals: the 30 million docked sheep, docking of piglets, neutering & spaying of cats & dogs. **Or is welfare of a species strangely tied to an economic consideration???**

The current proposal is for anyone to be allowed to dock lambs to prevent fly strike, but they want to stop the banding of puppies tails.

In my youth I worked on farms & witnessed each year the lambs being drafted away from their mothers, their tails being removed by hot irons or tailing rings & then the ensuing baaing & bleating as the lambs writhed around in pain on the grass. In contrast when I as an accredited bander band my puppies' tails at 24 – 48 hours of age no pain or distress is caused while the pups continue to nurse from their mother.

I strongly believe that both dew claw removal and tail docking are preventative measures in some breeds due to the breed characteristics. The way some breeds of dogs play, their enthusiastic greeting and the lack of hair to act as a shock absorber predisposes them to tail & dew claw injuries.

If dogs were to provide economic benefit to the country like sheep, cows, pigs would my submission opposing changes be required Somehow I doubt it!!!

I oppose the introduction of the banning of the shortening of puppies' tails & contend that this is NOT in the best interest & welfare of the dogs & propose we continue with the status quo as approved by the Dogs Code of Welfare 2010.

Out of Scope

1310

From: Nina Hofman s 9(2)(a)
Sent: Wednesday, 11 May 2016 2:08 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Follow Up Flag: Follow up
Flag Status: Completed

Nina Hofmann

s 9(2)(a)

s 9(2)(a)

Please change current laws .

Sent from my iPhone

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From: Cheryl O'Connor s 9(2)(a)
Sent: Wednesday, 11 May 2016 8:52 a.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Follow Up Flag: Follow up
Flag Status: Completed

I thoroughly agree with the proposed changes to ensure that animals are treated as humanely and without pain as possible and their safety ensured during transportation anywhere. Whilst not wishing to make the whole country vegetarians I do believe we have a moral responsibility to ensure that farm animals are not subjected to cruelty of any kind. We should be making their short lives as pleasant and pain free as we can, free range farming practices should be encouraged and even subsidised by the government, to ensure that they are cost effective. Animals that are subjected to anything that will compromise their safety like being left in cars in hot weather without ventilation or unrestrained in vehicles the owners/carers should be prosecuted. Animals are living creatures that deserve the same rights to a pain free existence as human beings, without cruel farming practices that cause them to be terrorised and tortured before being slaughtered for food production. The method of euthanasia should be quick and as painless as is possible. We are a compassionate society and we should set high moral standards in animal welfare and farming practices.

Cheryl O'Connor
s 9(2)(a)

Sent from my iPad

1313

From: jess goodman § 9(2)(a)
Sent: Tuesday, 10 May 2016 9:19 p.m.
To: Animal Welfare Submissions
Subject: submission on animal welfare regulations

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Blue Category

Hello my name is Jess Goodman
contact address § 9(2)(a)

my submission regards the document "proposed animal welfare regulations - care & conduct and Surgical & painful procedures

section 11 & 12 in regard to humane killing of crabs and eels - "insensible" appears to be a loose term, is there perhaps a better definition to assuming something is insensible?

section 17 - hens housing states that hens must be able to display natural behaviours eg scratching, dustbathing etc section 19 has no mention of ensure display of natural behaviours in colony or cage housing, there is also no comment about temperature/draughts within the housing of the cage or colony eggs - assuming they are in some sort of shed/barn - is there any protocols to ensure that hens living in an enclosed environment with several others are not at risk of overheating?
no mention about hens being exposed to natural light in colony or cage?
no mention about flooring of the cages in order to prevent contact with mesh grounds?
why is there not more of a push for the layer hens to be free range? ultimately this would support the natural behaviors of the hen as mentioned in section 17. why would we settle for minimal standards? is this not the prime time to ensure New Zealand leads the way on animal welfare?

section 26 - mating sow - term is not very clear

section 27 farrowing crates the definition of space within this is not clear - doesn't appear to cater to the natural behavior of the pigs - no mention about how long a pig would be in a farrow crate - this section appear very loose with its definitions - as mentioned above in regards to hens - surely this would be an perfect time to be moving towards free range?

what is a cost of having free range hens and pigs compared to caged? would there not be less work involved in having open areas on a section of land which would not require as much maintenance as enclosed spaces - especially in regard to egg laying of hens - more productivity with happier hens

keeping in with the theme of housing for animals - cows and sheep should there be a policy for cows and sheep to have shade/shelter for warmer weather and the cooler months, this may seem extreme, however in those hotter months often you do see these animals flocked under trees etc to keep cool - also no mention of access to water for these particular farm animals

section 47 young calves maximum time off feed - 24 hours seems an excessive amount of time for a young calf to be without food as younger mammals tend to feed every 2-4 hours - seems to be inhumane.

section 48 transport longer than 8 hours - this also seems to be inhumane as it is an excessive period without access to food/water and resting, incorporating section 47 if a calf was picked up in the later window of 24 hours and was in transport for 8 hours, that's nearly 32 hours with food/water

section 62 tail docking - therapeutic reasons - appears to be a very loose term needs more definition

section 63 cattle teats - no mention of pain relief under 6 weeks - why no perform by a vet or vet student as using "non visibly contaminated scissors" does not sound like sterile scissors and would very likely increase the risk of infection

section 66 cattle tail docking again therapeutic reasons loose term

section 67 cattle and sheep castration - under 6 months no mention of pain relief as pain will still be present with rubber rings - equivalent of putting a rubber band around your finger - causes pain.

section 70 sheep docking- should this not be same as cattle docking - both make equivalent amount of mess - why no pain relief for use of hot iron/rubber rings? ouch

section 71 sheep mulesing - are there non surgical methods being used that need to be included in this review?

section 74 horse tail docking - therapeutic reasons? what are the reasons?

section 81 pigs tail docking - under 7 days why not a vet performing this? non clinical person could increase the risk of harm/infection and no pain relief? they will still feel pain at 7 days, as a summary for the young animals mentioned in the above sections without the use of pain relief for procedures under 6 months etc - this would not be accepted on new born human babies, why should it be allowed on animal babies?

also this is done for tail biting - perhaps more should be looked onto why tail biting? is it because of stressful situations? would this not mean more reason to move to free range?

Thank you for taking the time to read my submission about the proposed animal welfare regulations, I look forward to hearing from you

Jess Goodman

✓ 1314

From: § 9(2)(a)
Sent: Tuesday, 10 May 2016 9:07 p.m.
To: Animal Welfare Submissions
Subject: feedback

Follow Up Flag: Follow up
Flag Status: Completed

As a RCNZ Rabbit council of New Zealand member for many years I would like to point out that as the main Governing body for rabbit in New Zealand since 1980s It would be nice to if RCNZ was be informed about any bio warfare going on in New Zealand so we can keep the domestic rabbit owners informed and updated. I myself was on the committee for several years and never once heard anything from any officials .

Having read in the South Island newspaper about the intended K5 release happening in 12 months time like in Australia.

Has anyone given any thoughts to the many pet, show and commercial rabbits that will die from this. Way more than the expected 30% wild rabbit population. Specially since the Vaccine Manufacture DR Mark White is not even sure how effective the current vaccine will be on K5.

Could there not be a more effective and tested vaccine available in New Zealand before the next release so the domestic rabbits don't have to suffer this very inhumane death. And yes as I have resently lost over 40 show rabbits [some rare breeds] to this horrible death and seen the rabbits die in screaming pain. Which is very upsetting for me too.

I get the farmers and market gardeners want to protect there farms. But don't us rabbit owners have the right to protect our bunnies and be informed to.

After all pet rabbits do make business to for the factories that make the pellets

Pet shops that supply rabbits gear

carry cages

Places that make the cages, hutches and

and many other businesses too.

Karen Yorke

✓ 1318

From: § 9(2)(a)
Sent: Tuesday, 10 May 2016 9:02 p.m.
To: Animal Welfare Submissions
Subject: animal welfare regulations

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mpi

I have only just found out about the regulations for the animal welfare. There are so many issues here with so many different animals and not enough time to prepare of any considerations

Regards Louise Quartley
Sent from Samsung tablet.

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1316

From: Gary Stephenson s 9(2)(a)
Sent: Tuesday, 10 May 2016 8:19 p.m.
To: Animal Welfare Submissions
Subject: Submission

Follow Up Flag: Follow up
Flag Status: Completed

This animal welfare proposal does not go far enough.

Animals are still used for painful testing which makes no sense when cosmetic testing was banned as inhumane. Rabbits are inhumanely tested to find out the efficacy of new viral diseases and are monitored during their painful death to see how long they take to die. A wholly barbaric practice.

Pet Rabbits are left open to a painful death from these viruses due to the efficacy of the vaccines being only 80% and the vaccine in itself can kill.

From an animal welfare point of view we lag woefully far behind many countries in our treatment and view of pet Rabbits which are given far less protection than cats and dogs. There is no reason at all why this should be.

Gary & Davina Stephenson

s 9(2)(a)
(a)

New Zealand

Tel: s 9(2)(a)

Email: s 9(2)(a)

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No guarantee is given that any attachments are virus free.

✓ (1317)

From: § 9(2)(a)
Sent: Tuesday, 10 May 2016 6:58 p.m.
To: Animal Welfare Submissions
Subject: Welfare of wild rabbits

To whom it may concern,

I'm writing to ask you to consider banning the release of the new strain of rabbit calici virus.

As I'm sure that you are aware this virus causes rabbits an extremely painful death. It is inhumane and if it were to be modified to kill wild cats there would be millions in this country opposed to a cat dying, screaming as its veins and arteries rupture. But because rabbits are more of a pest it is not widely well known what the virus is doing to them.

The new strain of calici virus also has no vaccine available for rabbit pet owners. Many people own rabbits because they are allergic to the usual house pets. These owners love their rabbits as much as a dog or cat. Therefore if their rabbit was to contract the virus these owners would be more than devastated not only from the pet dying, but to have it suffer such a inhumane death.

I own 5 rabbits. I lovingly care for them everyday. It breaks my heart to think of the unlucky ones in this world that were born in to cruel situations like animal testing labs, and the Chinese angoras that get their wool ripped out alive.

Please don't let a virus be released that will cause the rabbits of this world more pain. I understand farmers want numbers controlled. But there has got to be a better way.

Yours sincerely,
Amy Judd

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Out of Scope

1318

From: s 9(2)(a)
Sent: Tuesday, 10 May 2016 3:41 p.m.
To: Animal Welfare Submissions
Subject: alison clay submissions

I'm not sure how you go about submissions but I agree with the animal welfare additions. What I would like to see also is people with addictions and criminal offences banned from owning dogs.

Also, Housing NZ tenants are not meant to have animals in their houses unless they have written permission yet I see my neighbours in the street get through the system despite letters and intel footage of them having dogs there. They do not work, have addictions and very much known to the police. I have even seen them kick and abuse one of the dogs. Yet nothing changes. I'm sure there must be so many other dogs treated like this.

Anyway, that is a brief description of something I would love to see change in NZ.

Please inform me how I can be heard etc.

Kind regards

Alison Clay

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1319

Out of Scope

From: Natarsha § 9(2)(a) Fuldseth § 9
Sent: Tuesday, 10 May 2016 3:22 p.m.
To: Animal Welfare Submissions
Subject: Animal welfare Submission

Follow Up Flag: Follow up
Flag Status: Completed

- Proposed Animal Welfare Regulations (Care & Conduct and Surgical & Painful Procedures)
- MPI Discussion Paper No: 2016/12
- Natarsha Fuldseth

§ 9
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3.4.1 Option 1: Retaining the status quo

1. Animal cruelty

Examples of this kind of ill-treatment could include breaking a cow's tail or torturing a cat. Could other ill treatment be kicking or use objects to move or hurry livestock or house pets along/out of way?

3.4.2 Option 2: Developing regulations

These matters include, among other things: • whether the procedure fits the criteria for determining whether it is a significant surgical procedure; • the purpose of the procedure; • the extent (if any) to which the procedure is established in New Zealand; and • good practice in relation to the use of the procedure for animal management purposes or in relation to the production of animal products or commercial products

If it cause pain at time or procedure and after pain relief must be given to animal – for the time or as long as it should take for the animal to heal..

For example, some proposals such as disbudding¹² will require wider use of pain relief than is currently required. Some operators already use pain relief when disbudding—the proposed disbudding regulation is unlikely to affect these operators. For those operators not currently using pain relief the proposed regulations will require a change in practice.

High five to this regulation (finally)

5.3 HOW ARE THE REGULATIONS GOING TO BE ENFORCED?

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

RNZSPCA should have more involvement in animal welfare in farming with the use of MPI. Investigation should be open fields for RNZSPCA and welfare organisations... to pass on and obtain information... No Gag bills for NZ

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

Yes and No...i would like to see (in I equal justice world) for infringement fees and penalty of community service at animal sanctuary...

3.4.1 Option 1: Retaining the status quo In considering the proposals set out in Part B: Question 3: Are there any minimum standards or additional matters you think should become regulations immediately, which are not included in the regulatory proposals in Part B?

Regulating open investigation of animal cruelty for livestock and fishery...open to RNZSPCA and MPI

10.2 THE PROPOSALS

Are the exceptions at a commercial slaughter premises justified?

Only if animals (meaning human as well as we are animals) are in danger of injury...Animal crushing, or stampeding. Rods should be not on person but neat where is needed this will stop use of rods to just move scared animals to there death.

Justified only if rods will be used for emergencies are Tasers are for humans..

Are the exceptions for a circus justified?

Shouldn't have animals in circus anyway...but same rods are only for emergencies and will trained and content animals will not hurt there trainers...

If so, could those situations be adequately covered by proposed defence "The action was necessary for the preservation, protection, or maintenance of human life" (see section 4.1.5)? Are humans that more important then other species...Rods should be used as a last resort to move or keep aggressive animals away. Other techniques should be used... keeping place calm and dark.. no sudden noise or movement keeping herd animals in a herd to spooking the front or back of herd.

4. Dogs – Pinch and prong collars

Are there legitimate uses for pinch and prong collars where the risk of harm/misuse is outweighed and could be managed?

At no point should these collars have a place on a dog...Training a dog with out these collars is proven. Putting these collars on is to make the dog more agitated and more aggressive (dog fighting). So only time these collars are misused it will cause the dog to lash out. It could be managed by banning the use and sale on websites and stores.

5. Dogs – Injuries from collars or tethers

Should there be other restrictions such as 'must not prevent drinking', or fewer restrictions? Yes a very good sign the tether is restricting

Would it be appropriate for this regulation to cover all species restrained by a collar or tether?

Yes all tethering should be regulated if animals cant drink, lie down, and seek shade tethered either this means no care for the animal...tethering should be for short amount of time...and in long term tethering animal welfare codes must be followed.

9. Dogs – Secured on moving vehicles

My thought is all open trayed vehicle's come with an attachment to attachment metal chain to.

Could this also be open to unsecured dogs in cars... if dog hangs out of window of car then could potentially fall out. Regulate that all dogs travelling inside a car need to be either secured to car seat with tether and only able to out head out window. No dogs should be loose inside the car expect for dogs in boots or in closed trays.

12. Crabs, rock lobster, and crayfish - Insensible before being killed

Are there practical methods available to restaurants to render crayfish insensible before killing? Buy them already died...they do for all other meat why not lobster.

Additional no molluscs should be killed buy boiling.

13. Goats – Tethering requirements

Does 'shelter' need to be more clearly defined so that people know when they have met the requirements?
Tall enough for goat to stand walk around and stretch. Two goats wide on all sides...off the ground and easy to clean out.

Are these standards sufficient to protect the welfare of the goat?
For me goats should never be tethers same rights as all other livestock.

17. Layer hens – Opportunity to express normal behaviours in housing systems

Does a regulation offence provide an appropriate deterrent? There will never be a deterrent for the battery caged birds...people want cheap eggs so even if you put a deterrent of money on I'm sure they can pay or not pay and move on.

30. Exotic animals – Used in circuses

Should all circuses have restrictions on the use of specific exotic animals? No exotic animals should be used in circuses, they are wild animals, and they belong in the wild.

56. Cats – Declawing

Is it clear from the above definition when the procedure would be in the best interests of the animal? If not, why not?

Only reason declawing should be used is if an infection or destruction of claw bed is a result, declawing should not be used to stem out behavioural problems...as time and effort will fix these.

My summary is NZ is slowly putting livestock and house pets in the same category. They both have rights to live.

I will never understand why livestock will only be seen as money makers, so get treated the worst.

Battery hens I feel will take longer to, have the freedoms which our farmed pigs are going to get. A caged is a caged no matter how "enriched" you make the cage.

Farming practices should be more open and shown to the public, and slaughter practices as humans deserve to know how their food is created.

My one added point is more regulation in selling of animals on websites...selling a cross such as a labdoodle for \$500 is a rip off they are a cross breed and should be sold at same price as RSPCA so they have a chance of adopting out shelter dogs.

More regulation in the KC breeding. The papers must show the last 5 generations and name and relation to the offspring.

So buyers can clearly see mum was not breed with brother and buyers are not paying for a genetic mix up later.

Buyers should know that they can ask to have a health check of dog before buying or accompany the breeder to health check up.



This email has been checked for viruses by Avast antivirus software.
www.avast.com

✓
1320

From: s 9(2)(a)
Sent: Tuesday, 10 May 2016 10:11 a.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Good morning,

My name is Japhia Brooks and i cant say enough how grateful i am for the work you all have done in making this happen. As a major animal lover it breaks my heart to see any animal mistreated and abused, then on top of that the abusers walk away free of guilt, free of justice, free of any pain that they happily inflicted on our animals and pets.

There are still major issues that need to be address so i wanted to atleast give you some ideas because its better to say something then to stay quiet and just hope it goes away.

- Dogs that have been taken in by gangs and used for fighting and havent been fed.

There is a dog that lives just around the corner from me who a group of us have tried to help, one girl fed this dog and walked her and she started getting better until the owners locked her up again. SPCA have been notified but believe it is too dangerous for them to retrieve the dog. So nothing has been done to help her.

- Kittens and cats who are beaten and toyed with. Theyve been put in microwaves, eaten, skinned, thrown at walls you name it. They are dumped and left at the shelter or even in a rubbish bin.

- Dogs on the back of utes should just be banned. Some people will be happy to tie them up. Some people will say "its okay i do it all the time". Even dogs in cars should be on a harness at all times.

•Shelters and pounds should be Auditted every 3 months to assure the safety and wellbeing of the animals. Honestly if i had the money id run the whole lot myself cause some shelters are such a disgrace i cant go anywhere near them. Getting auditted would benefit both animals and shelters. Animals still have a chance while they are there. And humanity will always have a choice to do the right thing by treating these animals with care and love. These animals can go so far with even a little compassion. Auditting will bring down the ammount of outraged viral videos of local shelters mistreating these animals, it can increase employment, it can be a place to visit where people would be happy to take home these well looked after animals. Reducing the ammount of animals in shelters because they will be ready for new homes. PLEASE CONSIDER IT.

Im 23 I live in s 9(2)(a) right here in New Zealand, I own my own home specifically because i wanted a home for my animals and im looking to buy a lifestyle block next year to help more. Im a mum to 1 6month old puppy named Cleo, 2 6month old Kittens Cairo and King, and My Favourite 1 year old cat named Koda. Apart from the days i maybe a little late home from work to make their dinner or the one or two nights a month i go away for a night, these animals are so loyal caring and full of love because of how i treat them like kings and a queen.

I want all the help for the animals in our country and i believe we are heading in the right direction!

Kind Regards
Japhia Brooks

Sent from my Samsung Galaxy smartphone.

Out of Scope

From: Andre De haan s 9(2)(a)
Sent: Tuesday, 10 May 2016 9:51 a.m.
To: Animal Welfare Submissions
Subject: "Submission on Animal Welfare Regulations"

Please reply to this email so we know you have received it. Thank you.

This is a Submission on Animal Welfare Regulations regarding 68 Cattle, Sheep and Goat Debudding;

In this submission I prefer to mainly disbudding of calves, as this is where my experience lies.

I don't believe pain relief is necessary or practical when debudding with a scallop type dehorner, this practice requires the calf to be restrained in a head bale and remain calm to position the tool correctly on the bud for a successful operation. The scallop dehorner (or debudders) are quick and efficient, any prolonged attention to the animal by injecting with needles is both dangerous and upsetting to the calf. This method allows for older animals (up to 6-8 months) to be dehorned if the buds develop later in life on polled crossed horned animals, as in dairy beef. These become noticeable when drenching the animals, and it would be impractical to have an qualified anesthetist available for 2-3 animals to be debudded .

I much prefer scallop type debudders over a searing iron because the burning of a bud is a prolonged activity and burning is a lot more painful than a cut..

Pain relief has to be administered by a qualified person who is licenced to handle a restricted drug, I feel that if a farmer cannot be allowed to dehorn his animals, then the horns will not be removed at the appropriate time and will cause more stress and harm to the animal and surrounding individuals.

Regards,
Andre de Haan
s 9(2)(a)

Sent from Yahoo Mail for iPad

Out of Scope

✓ 1322

From: jacqueline.mcgraw s 9(2)(a)
Sent: Tuesday, 10 May 2016 9:41 a.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Good Morning

I welcome the proposed changes to Animal Welfare Regulations.
They are a step in the right direction.

However believe Bobby calves should not be taken away from their mothers at such an early age at all.
Certainly the other proposed changes are basic common sense and I am happy they will be enforced.

s 9(2)(a)

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1323

From: Stacey Power s 9(2)(a)
Sent: Tuesday, 10 May 2016 9:33 a.m.
To: Animal Welfare Submissions
Subject: Inducing cows

Hi there,

Currently in NZ is still legal to induce dairy cows to bring them back in season. This results in early births of premature calves, most are still alive. This is a practice that we should end. It's is inhumane. If you are looking at improving animal welfare this should be investigated too. Dairy farms are basically factory farms and the standards need to be improved too. Inducing of dairy cows are banned in Australia we should follow suit. Not only is it cruel to the cow but it is horrible for the calf that is born in pain and with no hope of survival being left to die in the paddock. Please you have a responsibility to address all animal welfare cases and this is a common practice in the dairy industry.

Regards
Stacey Power

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✓ 1325

From: Cheryl Hocking s 9(2)(a)
Sent: Monday, 9 May 2016 11:08 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations 2016

9th May 2016

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

Submission on Animal Welfare Regulations 2016

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

12.0 Surgical and Painful Procedures Regulatory Proposals

62. Dogs – Tail docking

My name is Cheryl Hocking and I have owned and competed in dog sports with Australian Shepherds (no tail) for 7 years. I am also an experienced domestic dog training instructor. My Australian Shepherds are Canine Good Citizen qualified (bronze & silver), approved Canine Pet Therapy dogs, approved volunteer dogs for BARK NZ (teaching bite awareness around canines) as well as being utilized by the Kapiti Coast District Council as education dogs for teaching dog safety to primary school aged children. I am not a breeder but a lover of this breed.

Australian Shepherds have been docked since the inception of the breed and I would like to have my submission considered for the proposed possible amendments to the Animal Welfare Policy 2016 and make my submission on the following issues.

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

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

The reasons for this are as follows:

If banding is done correctly it is relatively pain free and is minimally distressing to the pup as at that age the skin is soft and pliable, contrary to the emotive but ill-informed pronouncements of the anti-docking campaigners, please view this procedure on the New Zealand Council of Docked Breeds site www.nzcdb.co.nz/about-tail-banding.html. I viewed my Aussie when it was 2 days old along with all of its litter mates. At that point in time it had already been docked and showed no signs of distress or discomfort - the wound was clean and the puppy & its siblings were calm and content.

The shocking negative docking experiences that SPCA report are undertaken by NON NZKC registered, ignorant people breeding dogs and docking with no knowledge. Those cases that are publicized are certainly not done by an accredited tail docking person. I have yet to see the types of injuries and wounds publicized by the SPCA, or any welfare/rescue organisation, affecting any of the commonly docked breeds when done by a properly accredited person. No matter what legislation you bring in the backyard operators will continue to mutilate dogs, so the only people this legislation will effect are the good breeders who try to do right by their animals.

I feel it will also cause more stress on bitches as more and more breeders will transport them to other countries where docking is allowed to be undertaken so that the bitch can whelp & the pups can be docked and returned to their country of origin. There is apparently a common practice with Australia, who have banned docking in

certain states, who send breeds that are typically docked out of the country to whelp. Uprooting a pregnant bitch from safe and familiar surroundings & sending it in a crate as airplane cargo to another country where it will whelp is distressing - let alone allowing the pups to be docked by whatever method is approved in that country. Surely it is safer all around to allow an accredited person, bound by ethics and audited processes, to carry out the docking procedure.

Australian Shepherds, are a (NBT) natural bob tail breed and they are structurally built to work without a tail, with incredible speed, turning ability and surefootedness. Although not working dogs in the proper sense of the term my dogs often run with other dogs - a lot of them from working type lines (ie NZ heading dogs, huntaway mixes etc), on all surface types - sand, wet paddocks and so on. Many of the other dogs lose their footing at speed and end up going down and rolling from the momentum (and occasionally being winded from hitting the ground so hard and fast) however the Aussies, because of their surefootedness never seem to wipe out. My dogs (and I'm sure most Aussie Sheps) also excel at other fast paced dog sports such as frisbee and games like ball retrieve. The Aussie will take a ball or frisbee on the run either in the air or on the ground with no problems whatsoever and it is unlikely to miss or overrun it. I challenge the theory that a dogs balance can be affected directly by whether or not it has a tail. There is no difference whatsoever in the performance of a docked or undocked Australian Shepherd.

As a domestic dog training instructor I also dispel the theory that body language is an issue, there is no difference in the dogs attitude or ability to communicate. The presence and position of a tail is only one of a raft of human or dog to dog communication signals. Ear and lip position, eyes (is it eyeballing another dog or averting its gaze) and the dogs stance are primary indicators to another dog about their state of mind. My 2 docked Australian Shepherds are of sound and stable temperament thanks to good breeding practices and being properly raised. There are no issues with people and other dogs as shown by the qualifications they have gained. Being tailless is no barrier to communication.

Currently there is freedom of choice on banding or not banding and I feel it needs to remain this way as there is no evidence based data to support the need to impose a ban. If the breeder chooses to dock then they must abide by the existing rules where it is a controlled procedure undertaken by a properly accredited person.

Yours sincerely
Cheryl Hocking

/ 1327

From: s 9(2)(a)
Sent: Monday, 9 May 2016 3:04 p.m.
To: Animal Welfare Submissions
Subject: Proposal for changes to animal welfare act

I am objecting to parts 61 and 62 of your proposal. Removal of dew claws and tail docking in gun dogs is essential to remove the risk of ripping dew claws and splitting tails while hunting in close bush. The docking of tails at a later age once a dog has had to suffer through the pain of a split tail and infection is more animal cruelty than the removal before eyes are open as a pup.

Anyone who has had to go through this with a dog will understand.

I know of at least one serious dog breeder who is also an accredited tail docker who has stated she will no longer breed GSP's if unable to dock their tails to protect them from such injuries.

Consideration should also be given to the type of bush environment these hunting dogs are taken into. Hard NZ bush.

There are surveys showing that over 50% of hunt point retrieve dogs sustained a tail injury in one hunting season in Scotland and that the best practice to avoid this is docking.

It often seems that those campaigning for these types of changes are those looking in from the outside with no hands on experiences of what they are asking to change.

I would ask that you give serious reconsideration to these changes.

Regards
Kirstin Chapman
p s 9(2)(a)

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✓ 1328

From: Chris & s 9(2) Hill s 9(2)(a)
Sent: Monday, 9 May 2016 9:16 a.m.
To: Animal Welfare Submissions
Cc: becky@nzkc.org.nz
Subject: Submission on Animal Welfare regulations
Attachments: Animal Welfare review.pdf

Please find attached a submission on the proposed review of the Animal Welfare Act from The Brittany Club in New Zealand.

Regards

Chrissie Hill
Secretary/Treasurer
The Brittany Club
New Zealand
www.brittanydogclub.co.nz

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SUBMISSION ON ANIMAL WELFARE REGULATIONS

SUBMISSION FROM THE BRITTANY CLUB IN NEW ZEALAND

Presented by: Chrissie Hill

Secretary/Treasurer of the Brittany Club in New Zealand

s 9(2)(a)

Email: s 9(2)(a)

As Secretary of The Brittany Club in New Zealand, I am writing to you on behalf of the committee and members of the club, to express our concern at the proposed changes to the Animal Welfare regulations.

In particular we refer to the section on "Care and Conduct and Surgical & Painful procedures".

Section 3.5:

"The new criteria for determining whether something is a significant surgical procedure are described in such a way as to leave no doubt that where it is appropriate or not appropriate for a non veterinarian to perform this type of procedure".

It is the belief of the Brittany Club members that the procedure commonly referred to as "Tail Docking" should remain as an option of choice for both the breeder of Brittany's and the owners of individual dogs.

The Brittany breed, which originates from France, has a long history of traditional tail docking and in New Zealand is predominantly used as a hunting dog. The breed was first registered with New Zealand Kennel Club in 1975 and since then,

individuals have predominantly been docked – initially by veterinarians prior to the New Zealand Veterinary Association's ban enforced in 2011, and since then, by NZKC Accredited Dockers.

There are no statistics relating to injured dogs in the field available for our breed, because they have been docked – thus preventing any serious injury occurring.

In some overseas countries, the tail docking ban has been avoided by serious hunters who register their dogs as a "Working" breed.

There are undocked Brittany increasingly seen in New Zealand these days, but these are mostly not active in hunting situations. As the NZVA members do not dock tails, current breeders are using the NZKC Accredited Dockers scheme to enable the safety of their working dogs to be maintained. We support the status quo in this regard.

Section 4.0: Compliance and Enforcement.

"Currently, there are limited tools to address offending".

Animal Welfare Inspectors issue a Compliance Notice to person(s) to require them to stop or start doing something to comply with the Act and Regulations.

An infringement offence can cost between \$300.00 to \$500.00, and a Prosecutable offence can involve a fine of up to \$5,000.00 for individuals with a criminal conviction recorded.

The Brittany Club membership is concerned that there is a stated admission of limited tools to address offending.

If the new regulations are endorsed, what amnesty will be given to all owners of legally docked individuals at the time of implementation of the new regulations – estimated at this stage to be by the end of 2016? The Brittany breed enjoys longevity and it will be common in future to see young through to elderly dogs that were legally docked.

In addition, within our breed and many other canine breeds, there is a genetic element which produces puppies born with natural short tails or no tail in individuals. It is commonly referred to as a “**Natural Bobtail**”.

These individuals are not catered for in the new recommendations and present a problem as they are a perfectly natural phenomenon in the breed.

What assurances can be given to the public who currently, and in future own natural bobtail Brittany, that they will not be required to prove to anyone, including Animal Welfare Officers, that their dog is a natural bobtail – ie. born that way?

We are concerned that a dog displaying a natural short tail could be subject to a prosecutable regulation subject to criminal conviction and financial penalty.

Enforcement Discretion

“Educational material may be more appropriate for a first offence where there was a genuine lack of knowledge”.

The Brittany Club actively encourages its members to adhere to current legislation regarding tail docking and supports the continuation of the NZKC Accredited Docking scheme.

The fact that the NZ Veterinary Association members, in accordance with its Policy 9C – ratified 03 January 2011 and still current “ *opposes the prophylactic and cosmetic docking of dogs tails, and supports docking for medical or surgical reasons only*” makes the proposed new regulation in effect, a ban on tail docking.

If this is implemented, how will unscrupulous breeders who dock tails, claiming that the pups were born natural bobtails, be policed?

In addition, uneducated breeders may think that breeding two dogs which are natural bobtail together may be an easy option. In fact, this can be lethal to some or all of the unborn puppies. Some breeders may not care that their litters will be smaller. It does not bode well for the future population of our breed to have thoughtless breeding occurring just to produce natural bobtails.

No doubt the proposed regulation is seen as a therapeutic means of stopping people "chopping off" dog tails – but it has not been thought through carefully enough to stop unscrupulous people circumventing the regulations by any means possible.

CONCLUSION:

The Brittany Club members consider the current Accredited Dockers scheme to be the best way of administering the careful dog breeders who are tail docking with the welfare of their dogs uppermost. The current legislation should remain as it is.

If a ban on tail docking is to be introduced by implementing the proposed regulation on Canine Tail Docking, it is very important that the regulations be adjusted to reflect the situation owners of natural bobtail dogs will face.

It will be unfair to expect all bobtail owners to carry some sort of proof that their dog is naturally born that way – when as mentioned before, some unscrupulous breeders could take advantage of the situation and carry on docking regardless.

Without Veterinary supervision of tail docking, some sort of scheme has to be in place to ensure the well being of dogs and the existing Accredited Tail Dockers Scheme, supervised by NZKC, is the best way to preserve the integrity of the honest dog breeder.

Thank You.

Chrissie Hill

Secretary/Treasurer

The Brittany Club

New Zealand

Out of Scope

✓ 1329

From: Sue Angove s 9(2)(a)
Sent: Sunday, 8 May 2016 9:16 a.m.
To: Animal Welfare Submissions
Subject: Submission
Attachments: Submission An Wel Regs S Angove .docx

Categories: Blue Category

Hi

Please see my comments below.

Any queries please advise.



Sue Angove BVSc (Dist.) MBA (Dist.)
s 9(2)(a)

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Comments on Proposed Animal Welfare Regulations

8/5/2016

Prepare by: S. Angove as a private member of the public, who has worked as a vet, in the meat industry and on farm assurance programmes in NZ.

Overarching comments:

Yes, regulation is required for all areas including companion animals, sheep and beef and dairy sectors.

In addition education and effective communication with farmers is required, I would suggest many sheep and beef farmers do not know that a painful husbandry code exists, and if they do they wouldn't know where to find it. A lot of thought needs to be given to the follow up of implementation of these regulations and how the message will be publicised e.g. hard copies to all sheep and beef farmers.

The fine for infringements for people making a living off animals (i.e. farmers) should be higher \$3-500 is insufficient. It is still worth 'trying it on' to send one cattle beast/ cull cow if the fine is only \$3-500.

Unintended consequences

There must be a form of positive communication from the transporter to the person in charge (farmer), if farmers are not present at loading and animals are left behind by the transporter. Otherwise animals will be left behind (in extreme cases will die from dehydration/starvation in the yards) if farmers don't know they have been left behind.

Comments:

It says camelids need a mate, but the same requirement is not made for sheep?

37 What is the intent of using this as a regulation? To stop horned and non-horned animals hurting each other? Thus why not require horned and non- horned to be transported separately.

Secondly, horned animals transported together must then not hurt other horned animals.

Why? It makes a clear expectation for separation between horned and non-horned animals. This is an action that can be done easily and will reduce injury. The expectation is clear. As the proposed regulation is written its not clear to me what the expectation is.

Regarding the wording.

The proposed regulation does not clearly convey that sending animals with long horns > 110mm is not acceptable. It could be interpreted to mean that sending them, if they don't injure each other is ok.

38 The scale is quite complex (but something needed).

I find it hard to understand why you say you can't implement a standard for body condition scoring as it is too subjective (which would potentially have the biggest overall positive impact on ewe survivability for poor animals), but you have a lameness scale like this? My comment is that you should be including a minimum acceptable BCSing to assess acceptability of animal care and animal nutrition also.

40 It would be better to have a greater buffer e.g. not > 90% of the pregnancy completed, but you need to know mating dates. How are traders supposed to know mating dates? I do agree it is their problem however.

43 Facilities are needed where calves can walk on, but more importantly if the expectation is that they are to walk on rather than be shoved along then that's the expectation that should be conveyed also. How are transporters to encourage calves on? They will likely still have to be man handled even with good ramps etc.

Need to cover off the judicious use of aids too e.g. lack of efficacy of rattles etc.

45 Use a figure based on no. of hours e.g. 96 hours. It removes all uncertainty around day x v y. Take the time from removal from the dam as this is the first positive time that can be confirmed.

69 The regulation needs to be reworded to include tipping.

Tipping does not fit into the definition of dehorning as it is documented here, but still it causes pain and distress and has risk of infection and bleeding associated with it.

75 The definition is misleading. It is not just a probe, it's the vets arm holding the probe in their hand.

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✓ 1330

From: Di Falconer s 9(2)(a)
Sent: Saturday, 7 May 2016 6:15 p.m.
To: Animal Welfare Submissions
Cc: winston.peters@parliament.govt.nz; n.guy@ministers.govt.nz
Subject: Submission on Animal Welfare Regulations

Diana Falconer

s 9(2)(a)

7th May 2016

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

Submission on Animal Welfare Regulations 2016

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

61. Dogs – Dew claws

As a breeder of a long coated dog, I feel that preventing the removal of dew claws is not a wise idea. I know of some horrible injuries caused by unknowing owners who were not aware that the dew claws had grown round and back into the leg. It would surely be wiser to leave it to the vets to perform this operation, and make it a choice of the breeder, especially in the case of long haired dogs where the dew claw is seldom seen thanks to being covered in hair.

62. Dogs – Tail docking

I have been breeding Australian Shepherd for 13 years, and prior to that bred Rough Collies in South Africa for 20 odd years. I am pleased with the current state of the Tail Docking regulations, as a Controlled Procedure, allowing breeders to have their puppies docked by an Accredited Bander, with the scheme administered by the NZKC. I see no reason to change this regulation, leaving it in the hands of the breeder as to their CHOICE of whether to dock their puppies tails or not. There is no evidence based data to support the need for a ban.

More concerning is how they intend to police this regulation, given that my breed, the Australian Shepherd, carries a gene (NBT), Natural Bob Tail, meaning that we have puppies born with little or no tails. Case in point, I have had a litter born this year, that out of the 7 puppies, 6 were born with no tail or only a little nub. How are the inspectors going to enforce this? Certainly my Aussies are not affected in any way by having no tail, they have no problems communicating with other dogs, and there are plenty who are competitive in the agility ring with no tail.

In Scotland, they are busy reviewing whether to reverse the decision to ban the docking, due to the many, many tail damages that have been occurring since the banning of the tail docking. Should we not take stock of this, and keep things as they are until there has been some more consultation with breeders, and other countries.

Adults who need to have their tails amputated due to injury, have far worse pain and lasting discomfort, than a 2 -3 day old puppy who has minimal nervous system development especially in their tails. "The scientific view that puppies less than 10-days old are insufficiently developed in their nervous systems to feel pain in their tails is supported by: Professor Rudolf Fritsch (Head of Veterinary Surgery Clinic, Justus-Liebig University, Germany; Professor D. Grandjean, Veterinary School of Alfort, France"

Yours sincerely
Diana Falconer

s 9(2)(a)

Di, Allan and Bronwyn Falconer
Ukulunga Australian Shepherds



s 9(2)(a)

www.ukulunga.co.nz

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More concerning is how they intend to police this regulation, given that my breed, the Australian Shepherd, carries a gene (NBT), Natural Bob Tail, meaning that we have puppies born with little or no tails. Case in point, I have had a litter born this year, that out of the 7 puppies, 6 were born with no tail or only a little nub. How are the inspectors going to enforce this? Certainly my Aussies are not affected in any way by having no tail, they have no problems communicating with other dogs, and there are plenty who are competitive in the agility ring with no tail.

In Scotland, they are busy reviewing whether to reverse the decision to ban the docking, due to the many, many tail damages that have been occurring since the banning of the tail docking. Should we not take stock of this, and keep things as they are until there has been some more consultation with breeders, and other countries.

Adults who need to have their tails amputated due to injury, have far worse pain and lasting discomfort, than a 2 -3 day old puppy who has minimal nervous system development especially in their tails. "The scientific view that puppies less than 10-days old are insufficiently developed in their nervous systems to feel pain in their tails is supported by: Professor Rudolf Fritsch (Head of Veterinary Surgery Clinic, Justus-Liebig University, Germany; Professor D. Grandjean, Veterinary School of Alfort, France"

Yours sincerely
Diana Falconer

s 9(2)(a)

Di, Allan and Bronwyn Falconer
Ukulunga Australian Shepherds



s 9(2)(a)

www.ukulunga.co.nz

Out of Scope

✓ 1332

From: John Dyer § 9(2)(a)
Sent: Friday, 6 May 2016 10:42 a.m.
To: Animal Welfare Submissions
Subject: Submission on animal welfare
Attachments: Animal welfare submission.docx

Formal submission by John Dyer on Animal Welfare Regulations, discussion paper number 2016/2.

Contacts:

Mob. § 9(2)(a)

Email: § 9(2)(a)

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Formal submission by John Dyer on Animal Welfare Regulations, discussion paper number 2016/2.

Dear MPI

Item 28, pinch and prong collars.

People are held legally responsible for dangerous dogs. This regulation change would seem to remove a practical way they can modify bad dog behaviour. The suggestion that, only law enforcement and defence personal know how to use such a collar and should be exempted, is condescending. Many people outside these fields know how to train dogs as well or better. In fact I have watched a chained up police dog, in front of its handler and several other uniformed police, savagely barking and lunging at a small child and I had little doubt what would happen if this trained-to-attack-dog was released.

The idea that someone can be fined just for owning and/or using such a collar, even if it is acknowledged they never misused it, seems wrong in legal principle. I recently watched a large dog, (one of 3), charge out onto a busy winding 80kph road to challenge another passing dog that was being walked on a lead opposite. If I were that owner, I would want to ensure that my dog was trained to respect the road and so potentially save not only its' life but prevent serious harm of injury to other passing dogs and their owners and also to any motorist who might swerve dangerously to avoid it. If this dog had attacked the other and a formal complaint was made, would that dog then be put down? So how is its welfare served if it is then killed for want of appropriate early correction?

Prosecutions for the misuse of pinch or prong collars need to be put only in the context of deliberate and serious misuse. There is a huge difference between a Cretin abusing a dog and someone only having its' best interests at heart. This law and its' enforcers should surely be able to distinguish that. If an officer wants to prosecute an otherwise perfectly reasonable person because he found an old prong or pinch collar hanging up in their shed, that officer needs retraining and that agency needs to be reviewed. Saying, "we will only use it in the worst cases", is not good enough. In legislative circles, one of the tests of what makes a good law is that; "if a law can be abused, sooner or later it will be".

- Do not outlaw pinch and prong collars, just their serious misuse.

Item 62, tail docking.

The commentary to this section is quite misleading. There have been a number of overseas studies now that have all shown very clearly that working gundog breeds that traditionally have docked tails, (which have thin, very brittle tails when left intact), have suffered repeated and serious injury when left with and used with full-length tails. These injuries have been so frequent as to become non-responsive to surgery, gangrenous, needing

expensive repeated veterinary treatment and ultimately amputation. This painful adult operation is not to be compared to simply severing soft cartilage when puppies are very young. There is a fundamental reason why these sporting breeds and their ancestors have been docked since late Roman times and are depicted as such in century's old paintings. It is not because of "some new fashion fad", as has been previously claimed.

The suggestion by veterinarian lobbyists that working dogs are not over-represented in NZ tail injury data would seem to be disingenuous. It is not working cattle breeds or farm dogs but rather active sporting dogs of specific breeds that are at risk. Since they are mostly docked at present, how would they show up?

It is also disingenuous to suggest we need to follow Germany by banning such tail docking unless it is therapeutic. The German Hunting Dog Association (JGHV), founded in 1899, representing 298 hunting dog clubs and 200,000 members, very many of whom own this exact type of European origin dog, issued this emphatic 1996 AGM statement:

"The shortening of tails of this type of hunting dog is mandatory. Many generations before us knew the consequences of tail injuries and how easily these injuries can occur. The tradition of shortening of dogs tails is still as important as it was then. Shortening of the tails prevents injuries and therefore pain and damage. The veterinary practice reports numerous cases of, beginning with the end third of the tail, it is continuously painful, therapy resistant, has necrotic changes and results in repeated cases, in the total amputation of the tail".

"No longer used for hunting"?

According to a past radio statement by then Labour-List MP Dianne Yates, as dogs are no longer used for hunting, tail docking is no longer necessary. How she came to this conclusion is baffling.

There are c.250,000 licensed firearms owners in NZ. Of these, 40-50,000 people go gamebird hunting each year in NZ, (both licensed and landowners who don't need a licence on their own land). According to the Caithness Waterfowl Hunting Diaries, half of all gamebird hunters stated they use at least one dog, (and some use 2 or 3). Studies done by Graeme Nugent for FRI indicated that some 50,000 more hunters hunt big game animals such as deer and pigs. There is not a large cross-over between these two groups and in my experience, asking this question at Deerstalker's clubs, perhaps only 20% who hunt big game, also hunt gamebirds. So a very large number of dogs are used for hunting and this doesn't include all the many dogs used to hunt rabbits, possums etc. Only a few of these dogs would be show dogs known to the NZ Kennel Club. Which is to say that, the NZ Kennel Club does not legally represent this large group. Rather it is the statutory organization, the Fish & Game Council and various big-game hunting associations such as the NZ Deerstalkers Assn. Have these groups been contacted?

How Do Tails Get Damaged ?

Some breeds of dogs, such as German Shorthaired Pointers, have thin, whippy tails which by their very nature are brittle. This risk is compounded by the country they hunt in. These so-

called 'versatile' European pointing dogs breeds hunt in close cover, thick bushes and the like where they search out game. A video I have here shows such a pointer with a full tail that was never cropped. It is violently whipping it's thin tail from side to side slapping both flanks repeatedly and rapidly as it runs forward. If such a vulnerable flapping tail is caught up in a tangle of tree branches, or smashed against a rock, or is caught in a tree-crotch. Then the full weight of the animal's forward momentum works against its' trapped tail until something gives. Such tails when first damaged become more and more prone to repeated injury.

What "Terrier" Actually Means.

The word "Terrier" is often translated as Latin for "ground" with the claim in dog books that it is because these little dogs are intended to hunt below ground. However, this isn't the whole story. While the public refer to "fox holes" and "fox dens", the same fox burrow is known in English hunters' language as an "earth". French hunters' language refers to a fox earth as "le terrier". So the terrier dog is intended to hunt down fox earths and also in the dens, (actually "setts"), used by badgers. Terriers in New Zealand naturally hunt rats and rabbits and very often this is down narrow holes too or in other tight places such as thick undergrowth, brush-piles, piles of timber and other rubbish, etc. It's not for nothing that there is a particular traditional narrow spade made by British firms for digging them out, (called the 'rabbiter')! Turning around in such tight places frequently damages full-length tails. I have hunted foxes in such circumstances in England and in Australia. No long-tail would be safe from damage. That is the reason why the Jack Russell terrier, among other specific terrier breeds, has a docked tail. I have also been present in New Zealand when my Jack Russell took it on himself to do what is naturally bred into him and his ancestors over centuries and start hunting rabbits out of a warren.

A dog cannot show the full range of emotions without a full tail – yeah right!

As the owner of several docked-tail dogs, I find this statement almost too ludicrous to merit response. I have never had any doubt from observing the shortened tail of my German wirehaired pointers, (or similar breeds), if they were being aggressive, submissive, frightened, cold, happy, on point, (their wag speed, if any, indicates what they're pointing), or any other emotion a dog might convey. I have never seen a dog fight start because other dogs did not notice the shortened tail signaling submission. Nor have I seen a docked tail dog have any difficulty swimming; in fact, the German wirehair is a superior swimmer. They will swim for hours on end in a large pond if allowed to and they cope with well with large waves and heavy currents in a lake or river. Despite such difficulties, they still retrieve large objects such as Canada geese and often over very long distances in large lakes.

This claim that they "don't have a proper rudder" is just another glib one that someone dreamed up because they wanted to impress those who know nothing about these breeds. A wirehair can turn on its own axis in the water and frequently does so in some situations. Comparing a Labrador, (which I have also owned), I doubt they swim or turn much better or worse. Their tail usually just follows them.

Some New Fashion ?

It has been claimed by retired Labour-list MP Dianne Yates that tail docking is merely a

fashion. My dictionary lists fashion as "a current style of dress". Current, in turn, is defined as "contemporary" or "of most recent date".

Primitive carvings in stone in the Carpathians region, estimated to be 1,000-years old, show the Magyar hunter, his falcon and his Vizsla pointing dog. Written accounts about the hunting breed now developed and known as the Vizsla of Hungary, dated around 1100 A.D., describe even then the necessity for cropping tails to prevent injury. I find it difficult to square with Ms Yates statements about tail docking being some new fashion that is no longer needed, when the Vizsla dogs we have in the field in NZ today, that have been docked for more than 1,000 years, are much the same breed.

The German-language book *Die deutschen Vorstehunde* (The German Pointers) by Manfred Hölzel, (Kynos Verlag 1986), shows a copper engraving dating 1621 that shows a "water-hound, part-shawn and with docked tail". The animal's long coat was part-shawn to assist it to swim with the vital parts being left long to maintain warmth. The modern clipped French poodle reflects this heritage. In a wood-cut dated 1582 by J. Amman the description states, "Falconing: In the foreground, nobleman with docked-tail short-hair pointer and with falcon". Another woodcut by the same artist shows, also in 1582 is described as, "Falconry Mews (i.e. mews = a falcon aviary): In foreground, long-haired hawk-dog, in middle-ground, short-haired docked-tail pointer". That's over 400-years ago.

In fact, the book depicting these historic prints refers to the practice of tail docking German pointing breeds being common in Germany from the 16th century onwards. These pointing breeds are the ancestors of the Weimaraner, German Shorthaired Pointer and German Wirehaired Pointer that are all very well represented in New Zealand today. My article on the race history of the latter breed is reprinted in the NZ Kennel Gazette, (Vol. 41, No.9 October 2001).

German Shorthaired Pointer history:

By 1590 technological developments meant that sport of shooting gamebirds in flight over pointers was already becoming popular among the nobility in Italy and Spain. The Habsburgs of the Spanish throne exported this fashion to other European countries. By 1677, in the German state of Darmstadt, the basis of the German Shorthaired Pointer was already in existence. So it has been a recognized docked breed for well over 3-centuries.

The Shorthaired Waimaraner.

This breed's history can be traced to at least 1631. Not docking a shorthaired Waimaraner's tail has always been considered "a very serious fault" in any of the internationally accepted judging standards that I have seen. So this breed has been docked for perhaps 4 centuries.

The Long-haired Waimaraner.

This is a rare breed in NZ but one with a German history that traces to at least 1873. This breed-variant has enough hair on their tail to protect it from damage and they are not docked. So it is not some arbitrary fashion choice, but driven by pragmatic welfare concerns.

The German Wirehaired Pointer.

A.k.a. the Deutsch-Drahthaar, this breed has a history tracing to the end of the 19th century. Again, this breed has always been docked in that more than 100-year history, and several of the breeds that helped establish it, for centuries before that. This is not done to win shows. Membership of the Deutsch-Drahthaar Association has a strict rule that members may **NOT** show their dogs. This is because the show ring selects for traits which are not desirable in sporting dogs, for instance, unnaturally long coats that are simply not practical in the field.

- Animal breeders who are fully familiar with the docking of dog tails, and who do so for breeds that are traditionally docked for welfare reasons, to protect them from field injury, should continue to do so. In many cases their competence is at least as good as a vet's, simply by virtue of the number of puppies' tails they have done.
- It has been claimed that vets who provide this service to animal breeders have subsequently been censured and threatened by their associations. This is bullying. This is completely inappropriate in this country and clear provision for providing such assistance to dog breeders, (when requested), should be spelled out in law. If this situation is as bad as it has been reported to me, then it would explain why few semi-independent vets want to raise their heads above the parapet to support the breeders, for fear of the consequences to their supply of veterinary needs.

Item 82: Pinioning or otherwise de-fighting a bird.

It is a standard condition of Department of Conservation issued waterfowl holding permits, for those who have exotic waterfowl in NZ, that they should be permanently pinioned. This is to prevent escapes to prevent the potential for biosecurity risks. Clearly, if pinioning can only be done for therapeutic purposes, that precludes the ownership of many exotic and colourful waterfowl to put on public display at zoos, public parks and in private collections. It would no longer be practical in many circumstances.

Again I would ask; has the statutory organization the NZ Fish & Game Council, been consulted?

It would be possible in some situations to fence in the entire pond, at great expense and trouble. The risk of escapes would, of course, be much exacerbated, for instance, by a single tree branch falling through the netting and leaving a gaping hole.

I have been a waterfowl enthusiast for more than 40 years. In that time I have never had to pinion a duckling, however I am told it is a very simple procedure akin to cutting fingernails. The very tip of one soft wing bud is removed with sharp scissors at a few days of age. The discomfort of that one snip is very minor, if at all. Apart from this wing tip, the bird has full use of its wings for every other purpose. It does not look or act mutilated, for instance. However it cannot fly.

Adult birds can also be de-flighted and the process is not difficult. In fact, I had had to explain it to a vet, who had never done it before, but who thought that even as a lad that I should be perfectly capable of doing that small operation. He then advised me where to get the necessary antiseptic powder to dust the wound. These same birds lived for many years afterwards on my pond. One of the American zoos provided information in its yearbook on how the operation needed to be done. Simplicity and lack of complications was the main point.

I'm not aware of anyone who has botched this operation and I know or have known many of the waterfowl breeders in New Zealand via Ducks Unlimited, (NZ), Inc. So I'm not actually sure what this tinkering with the regulations is trying to fix. Once again, the changes proposed would seem to remove any need to prove cruelty which should suit lazy enforcement staff. They could still prosecute even when well aware that no cruelty had been involved. Once again; "if a law can be abused, sooner or later it will be".

I have professionally come across an individual in urban Point England, Auckland, who took it upon himself to break the wings of all the wild ducklings he reared in his backyard, so they couldn't leave. In that way he had a ready source of meat. Having executed a search warrant on him, (as a warranted Wildlife Ranger), I also found plucked and table-ready ducks in his freezer. However the SPCA officer that accompanied the police officer and I made no effort to prosecute him for this wanton cruelty. Clearly it was not the Animal Welfare Act that failed, if no effort was made to use it. Further tinkering with the law will not improve that lack of commitment.

- I recommend that pinioning of waterfowl be done, where required as part of a DoC* holding permit, for any species of waterfowl. That it be done by people who are well versed in the proper procedure, but not necessarily only by vets who may in fact have no experience of this operation.
(*there is also a proposal that NZ Fish & Game Council should instead issue any gamebird holding permits. This matter is in presently in negotiation).

Additional comments:

I have a concern that, while MPI is concerning itself about such things as wing-pinioning, tail-docking and dog pinch collars, that this is fiddling while Rome burns.

\$21 million has recently been allocated to dropping 1080 nationwide that takes from 6 to 18 hours to kill. Pictures of dogs on YouTube that have been poisoned with 1080 are just horrendous, to say nothing of the effect on horses or deer. Yet the National Animal Welfare Advisory Committee wants to phase out the thoroughly proven Fenn humane traps because 5% of stoats aren't killed immediately but take 1-3 minutes to fully die. So they want to remove the best trap ever made, to replace it with a DoC one that isn't fit for purpose, at

the risk of making our national kiwi icon even more endangered. Stoat welfare before native bird welfare.

Likewise, the method for DoC to kill thar in the Southern Alps is by shooting them repeatedly with buckshot, out of range, from a helicopter, until the animal is broken down, falters and then falls onto rocks below. No effort is made to see if it actually died or not. It seem to me that government funded cruelty is of a massive scale in NZ and that looking into such things as wing-pinioning, tail docking and pinch collars is just window dressing to hide that. If the welfare of possums, deer and other wild animals fall outside your jurisdiction because they are pests, then how is it that NAWAC can concern itself with supposed cruelty to stoats? What about the kea, moreporks and other 1080 'by-catch' native birds that die in convulsions?

If anything is going to poison "Brand NZ" internationally, it is surely \$21-million of aerial broadcast 1080. It is not a cynical move to ban pinch collars, tail docking and wing-pinioning.

Sincerely

John Dyer

05/05/2016.

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Out of Scope

1333

From: Karen Edney s 9(2)(a)
Sent: Friday, 6 May 2016 10:42 a.m.
To: Animal Welfare Submissions
Subject: Consultation on proposed animal welfare regulations

Hello

I would like to congratulate MPI National Government team on these proposed animal welfare regulations. These proposals are definitely heading in the right direction and I commend MPI and I thank MPI sincerely. But I do believe Animal Welfare should be governed by a separate portfolio to provide unbiased and uncompromised solutions to Animal Welfare.

Kind Regards

Karen Edney
s 9(2)(a)

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✓ 1334

From: Val Walker s 9(2)(a)
Sent: Thursday, 5 May 2016 8:54 p.m.
To: Animal Welfare Submissions
Subject: SUBMISSION ON ANIMAL WELFARE REGULATIONS
Attachments: MPI Animal Welfare Submission.docx

To Whom it may concern

Please find my Animal Welfare Regulations Submission attached for your information.

I hope to hear from you in the near future to tell me you have received my submission.

Thank you for your time

Valerie Walker

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

s 9(2)(a)

Ph.: s 9(2)(a)

Mobile s 9(2)(a)

Email s 9(2)(a)

SUBMISSION ON ANIMAL WELFARE REGULATIONS: DEWCLAWS

My Submission on animal welfare: Dewclaws serve no purpose other than getting in the way, i.e. carpets, toys or furniture and, if caught on something causes extreme pain and puts the animal at risk of an infection.

Dewclaws are still allowed on puppies prior to the eyes opening in Australia and the United Kingdom, done properly by a vet there is no cutting through the bone so it is not significant.

I personally have my puppies' dewclaws done by my Veterinarian on day three.

If left intact since they don't wear down by walking like a dogs regular toe nails do, In fact if left unclipped, dewclaws nails tend to grow in a curve, embedding themselves into the dewclaw pad causing painful over growth .

Thank you for taking the time to read my Submission.

Valerie Walker (Mrs) NZKC Member an Accredited Breeder with the New Zealand Kennel Club.

s 9(2)(a)

Ph.: s 9(2)(a)

Mobile: s 9(2)(a)

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Thank you for taking the time to read my Submission.

Valerie Walker (Mrs) NZKC Member an Accredited Breeder with the New Zealand Kennel Club.

✓ 1355

From: Anastasia Shadrina s 9(2)(a)
Sent: Thursday, 5 May 2016 1:28 p.m.
To: Animal Welfare Submissions
Subject: Submission
Attachments: Kerry blue terriers MPI Submission v2 4.5.16.docx

Dear Sir / Madam

Please open attached submission form from me as an accredited breeder of NZKC.

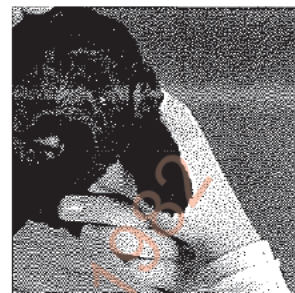
Best regards
Dr Anastasia Shadrina
Legartis Kerry blue terriers

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

4th May 2016

Dr Anastasia Shadrina

s 9(2)(a)



Re: Animal Welfare Regulations Submission

Introduction

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

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

The contact person for this submission is:

Name: Dr Anastasia Shadrina

Address: s 9(2)(a)

Contact Phone: s 9(2)(a)

Email: s 9(2)(a)

62. Tail Docking

I have been breeding and showing Kerry Blue Terriers for more than 15 years, Accredited breeder NZKC, also Doctor Gynecologist in the past and over this time I have never encounter your issues that you refer to in What is the Problem:

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

Response

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

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

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

Response

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

Dockings is carried out by Dedicated Breeders who have the upmost dedication to the docked breeds and carry out this very quick procedure before puppies reach 4 days of age. At this point in their lives the puppies cannot stand, see or hear, and the pain receptors are not fully developed. No pain or distress is caused.

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

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

Tails are banded in NZ by accredited banders when the puppies are generally less than 2 days old and their tails' bones, nervous system and pain sensors are not yet fully developed. As such, they feel no pain. These procedures help prevent more painful injuries later in life and better enable these dogs to perform the functions for which they were originally bred.

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

Response

Yes this maybe the case it crept into Australia through Western Australia before any of the Dog Breeders / Owners new it was being brought before their Animal Welfare and had no chance to object or have their say this is not what is known as democracy and had they had the chance they would have fought to remain what we have here in New Zealand **FREEDOM OF CHOICE.**

How will regulations help?

Response

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

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

Response

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

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

Response

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

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

Conclusion

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

Kind Regards

Anastasia Shadrina
 Legeartis Kerry blue terriers

4th May 2016

Dr Anastasia Shadrina

s 9(2)(a)



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The contact person for this submission is:

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Address: s 9(2)(a)

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

Dockings is carried out by Dedicated Breeders who have the upmost dedication to the docked breeds and carry out this very quick procedure before puppies reach 4 days of age. At this point in their lives the puppies cannot stand, see or hear, and the pain receptors are not fully developed. No pain or distress is caused.

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

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

Tails are banded in NZ by accredited banders when the puppies are generally less than 2 days old and their tails' bones, nervous system and pain sensors are not yet fully developed. As such, they feel no pain. These procedures help prevent more painful injuries later in life and better enable these dogs to perform the functions for which they were originally bred.

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

Response

Yes this maybe the case it crept into Australia through Western Australia before any of the Dog Breeders / Owners new it was being brought before their Animal Welfare and had no chance to object or have their say this is not what is known as democracy and had they had the chance they would have fought to remain what we have here in New Zealand **FREEDOM OF CHOICE.**

How will regulations help?

Response

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

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

Response

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

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

Response

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

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

Conclusion

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

Kind Regards

Anastasia Shadrina
 Legeartis Kerry blue terriers

Out of Scope

1336

From: Ministerials
Sent: Thursday, 5 May 2016 9:05 a.m.
To: Animal Welfare Submissions
Subject: FW: MINISTERIAL: Contact form submission from nathanguy.co.nz

A submission for you. Please see below

Cheers,

Out of
Scope

Out of Scope | Support Officer

Ministerials & Business Support | Office of the Director-General Ministry for Primary Industries - Manatū Ahu Matua
Telephone: Out of Scope | Web: Ministerials Kotahi Page or www.mpi.govt.nz

-----Original Message-----

From: Out of Scope
Sent: Tuesday, 3 May 2016 11:32 a.m.
To: Ministerials <Ministerials@mpi.govt.nz>
Cc: Out of Scope
Subject: MINISTERIAL: Contact form submission from nathanguy.co.nz

Not for reply. Could you please forward to Out of Scope team to consider as a submission on the animal welfare regs? Could you please also let me know who is coordinating submissions?

Thanks heaps!

Out of
Scope

-----Original Message-----

From: Out of Scope
Sent: Tuesday, 3 May 2016 11:30 a.m.
To: § 9(2)(a)
Subject: RE: Contact form submission from nathanguy.co.nz

Dear Jenny

On behalf of Hon Nathan Guy, Minister for Primary Industries, thank you for your email regarding dogs. Please be assured your comments have been noted. I will place a hard copy of 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

-----Original Message-----

From: website@national.org.nz [mailto:website@national.org.nz]
Sent: Sunday, 1 May 2016 7:20 p.m.
To: nathan.guy@national.org.nz

Subject: Contact form submission from nathanguy.co.nz

Submitted on Sunday, May 1, 2016 - 19:20

Please don't reply directly to this email. If you need to reply to the person who submitted a comment, please either click on their email address (below), or forward this message and copy their email address into the send-to box.

Your name: Jenny

Email: s 9(2)(a)

Subject: animals

Your message:

Find it very sad that you don't understand how important Dogs and other animal are to animal lovers .

We have shown Boxer dogs for years and have been the people who have docked our own puppies NEVER EVER had a problem or any pain related in site to any Babies .You would not doubt be very concerned with horse racing and the flogging of horses to run faster Do you understand our dogs are our children we don't even go on holiday without them We have docked in access of 1000 puppies for self and others Please dont allow ignorance to be the reason for your misunderstanding

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

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From: s 9(2)(a) & Chantal s 9(2)(a)
Sent: Thursday, 5 May 2016 8:29 a.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Submission
Attachments: IMG_7533.JPG

Hello,

Ban chaining of dogs: I hate seeing dogs chained up 24/7. People acquire dogs, do not have fences and the easy option is to chain them. These dogs end up badly socialized and neglected and eventually become problem dogs. I would love to see this practised banned. If you want a dog, then fence your property.

Improve living conditions of Pig Dogs: I live in an area that has many pig dogs. These dogs are kept in confined cages for long periods of time. I find this practise to be totally disgusting. I attach a photo of dogs kept in such a way. The SPCA cannot do anything about these dogs living conditions, as long as they have water and shelter it is deemed adequate. Which quite clearly it is not! The summer temperatures were very hot and these dogs had to sit on the hot concrete. Just one case in point.

Desexing of pets made mandatory: As a volunteer in a rescue organisation I see many unwanted puppies and kittens that come to the shelter on a daily basis. I wish that desexing of all dogs and cats was made mandatory. This would save the country huge amounts of money as the resources put into caring for all these unwanted animals, could be used elsewhere.

Thank you for allowing me to have my say,
Kind regards
Chantal Vanderlinden



From: s 9(2)(a) & Chantal s 9(2)(a)
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From: s 9(2) and Shelli Mears s 9(2)(a)
Sent: Wednesday, 4 May 2016 11:52 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Categories: Blue Category

Sender: Michelle (Shelli) Mears
Sharemilker
s 9(2)(a)

Address: s 9(2)(a)

Phone: s 9(2)(a)

Dear Sir/Madam,

I thank you for the opportunity to attend the recent consultation meeting in s 9(2)(a) and for the opportunity to make a submission on the proposed regulations.

I wish to call your attention to a concern over your proposal number 43. Young Calves – Loading and Unloading Facilities.

As you rightly mention in your proposal, young calves will not readily or voluntarily walk up or down a loading ramp. They will also not voluntarily enter a truck from a loading platform at the same height. This means that those people in charge of loading the trucks are still going to need to use some sort of force to move the calves onto the truck. My concern is that, if careful thought is not put into the design of the facilities, the amount of pushing/pulling force required to move the calves would actually be MORE stressful and potentially harmful to the calves than a simple and direct lift from a ground level pen to the truck would be. In other words, simply requiring that there be a loading ramp in place will not necessarily improve the welfare of calves during loading and may even put further unnecessary stresses on both them and the handlers than the current systems in place on many farms.

For instance – if a normal cattle sized loading ramp were installed at our farm in front of the pens where bobby calves are reared, this would technically meet the wording of the proposal. However, I know that moving the calves to the bottom of the ramp, and then pushing them up it to truck level would require much more “manhandling”, pushing and shoving of the calves than our current system of me gently lifting them from their rearing pen, passing them to the driver who places them into the truck. If a raised platform is built it would need (as you identify in your proposal) to be roofed and weather proof. Standard guidelines for calf facilities for weather protection and sufficient air flow are that the pen should be at least 1.5 times as deep as the roof is high. Assuming the roof would need to be a minimum of 2m high to allow truck drivers to enter the pen and access the calves, this means that the pen must be at least 3m deep. That’s a pretty big structure for the usual 3-6 calves we send on any given collection day! Making the pen smaller but still high enough for drivers to stand up in will mean the calves are inadequately protected

from the weather. Making the roof lower to protect calves from the weather better will mean drivers cannot stand upright and will be forced to reach in and pull calves out of the pen – causing just the stresses we are all trying to avoid.

As you can see above, I harbour significant concerns that the proposal as it stands will not increase the welfare of bobby calves and may in fact be detrimental to their welfare.

I understand from the meeting that it is anticipated that many of the regulations around young calves are expected to be in place before the next spring. Whilst I can fully appreciate the urgency around having some of these actions happening before the next calving season, I beg you to fully consider exactly what you are recommending and how it will be put in place on farm – and the potential animal welfare outcomes of that – before you rush in and push some half-thought-out ideas into law just to be “seen to be doing something”. More harmful videos of bobby calves being pushed/shoved up loading ramps or shivering and wet in poorly designed loading facilities will not help our industry or the calves concerned!

I am happy to speak with anyone about my submission and can be contacted with the details above.

Yours, Michelle (Shelli) Mears

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1992

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Out of Scope

1339

From: John Henry s 9(2)(a)
Sent: Wednesday, 4 May 2016 8:18 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

John Henry

s 9(2)(a)

s 9(2)(a)

I would like to support a ban on the feathering (chaining) of dogs. Instead, a kennel with attached run of a minimum three dog lengths should be used.

A phasing transition will allow for the education of dog owners and to give time to procure the new kennels (with runs).

This ban of tethering could be extended to other animals.

A strengthening of this would include the kennel and runs being made of fire proof materials.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

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From: Danika Tana s 9(2)(a)
Sent: Wednesday, 4 May 2016 6:50 p.m.
To: Animal Welfare Submissions
Subject: Submission

Hi there,

Im not sure exactly how I am meant to word my submission but I would like to express my keen interest in doing so. I think it's appalling how many animals are kept chained, living in horrible circumstances, with owners that are free to abuse, neglect and mistreat the animal they bought home to be a pet. While I'm sure there are many other issues at hand that could be addressed (sentencing and punishment of repeat animal abusers, etc) I understand that it is a lengthy and difficult process.

Please speak up for the poor animals throughout our country and do right by them. These dogs are not purposely acting out and becoming dangerous. They are being raised in situations where the behaviour is a result of carelessness on the owners behalf.

With all this said, I think I might my point of view in my submission very clear.

Kind regards,

Danika Tana

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1341

From: § 9(2)(a) on behalf of animalwelfare
Sent: Tuesday, 3 May 2016 4:11 p.m.
To: Animal Welfare Submissions
Subject: FW: Submission on ANimal Welfare Regulations
Attachments: MPI Submission v2 (Annemarie Reid).docx

Follow Up Flag: Follow up
Flag Status: Completed

From: Annemarie Reid [mailto:§ 9(2)(a)]
Sent: Tuesday, 3 May 2016 9:48 a.m.
To: animalwelfare <animalwelfare@mpi.govt.nz>
Subject: Submission on ANimal Welfare Regulations

From: Annemarie Reid
Sent: Tuesday, 3 May 2016 8:50 a.m.
To: mpi
Subject: Submission on ANimal Welfare Regulations

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

3 April 2016

Anne-Marie Reid

s 9(2)(a)

Re: Animal Welfare Regulations Submission

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

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

New Zealand Council of Docked Breeds (NZCDB)

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

The contact person for this submission is:

Name: Anne-Marie Reid

Address: s 9(2)(a)

Contact Phone: s 9(2)(a)

Email: s 9(2)(a)

General Comments

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

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

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

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

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

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

If the tail docking ban goes ahead I can see many more vet visits and extra costs. As in wet of dead tail and dew claw injuries. All of which are preventable. Or not take my dogs near water which means they are not enjoying life as they should. My dogs are also therapy dogs in a rest home and the tailed dogs aren't preferred as the wagging tails cause bruising on the elderly that have very delicate skin on their legs, and the docked dogs have been requested.

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

Conclusion

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

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

Thanking you

Anne-Marie Reid

Out of Scope

✓ 1342

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

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Blue Category

Attached.

Matthew Hanson
s 9(2)(a)

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Proposal 1:

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

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

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

Proposal 2:

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

Proposal 3:

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

Proposal 4:

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

Proposal 5:

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Proposal 6:

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

Proposal 7:

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

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

Proposal 8:

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

Proposal 10:

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

Proposal 11:

Eels ought to be killed before desliming

Proposal 13:

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

Proposal 14:

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

Proposal 15:

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Proposal 16:

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

Proposal 17:

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

21:

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

22:

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

25:

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

47:

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

51:

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

58:

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

64:

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

70:

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

81:

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

✓ 1343

From: Taylor Pascoe s 9(2)(a)
Sent: Sunday, 1 May 2016 8:36 p.m.
To: Animal Welfare Submissions
Subject: Bring in stronger laws for animals

Follow Up Flag: Follow up
Flag Status: Completed

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

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

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

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

From: Kevin Westbury s 9(2)(a)
Sent: Sunday, 1 May 2016 9:23 a.m.
To: Animal Welfare Submissions
Subject: 'Submission on Animal Welfare Regulations'

To Whom it may concern,

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

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

I would like the opportunity to speak on these concerns to those making the amendments to the Act.

Regards

Kevin Westbury
Ultra-Scan Eastern Waikato Limited

s 9(2)(a)

Mobile: s 9(2)(a)

Out of Scope

1344 1302

From: Kevin Westbury s 9(2)(a)
Sent: Thursday, 12 May 2016 8:32 a.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Proposals

Follow Up Flag: Follow up
Flag Status: Completed

To whom it may concern,

I believe the proposal of limiting extra teat removal to under 6 weeks of age without anaesthetic is impractical. It is too tight a timeframe for the likes of our technicians to get round all farms and do this procedure for our clients while doing the disbudding.
I believe 8-10 weeks maximum age without anaesthetic would be far more suitable without causing the animals any more duress.
I would like the opportunity to speak on my concerns.

Kevin & Jayne Westbury
Ultra-Scan Eastern Waikato Limited

s 9(2)(a)

Mobile : s 9(2)(a)

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From: Caprinex <caprinex@xtra.co.nz>
Sent: Thursday, 28 April 2016 5:02 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Follow Up Flag: Follow up
Flag Status: Completed

This submission refers to Clause 13 – Tethering of goats

Although the Goat Welfare Code states that the minimum standard is to provide daily access to a reliable supply of drinking water, and logical animal welfare thinking would support that, and no doubt it applies to dairy goats, in practice it is not borne out by normally practiced commercial pastoral goat farming.

The 2 year study by the late Dr Ron Kilgour in the 1970s specifically states that no drinking was done by the observed feral goat herd at any time. Our own experience with a healthy tethered goat on adequate roadside grass over 17 years showed no consumption of water. Similarly our farm scale experience farming pastoral goats over 40 years shows only casual consumption of water. Clearly, pastoral goats – even lactating, can obtain sufficient moisture from vegetation for their daily needs

On a somewhat similar note, as Kilgour showed, goats sought shelter from rain, but practical observations show that they will lie out in sun, under situations where cattle and sheep seek shade.

It is suggested that many of the complaints about tethered goats derive from public perceptions that the “poor animal has no water, and/or shade” without understanding goat physiology.

While it would be naive to suggest that tethered goats should not have access to water, or shelter, this does perpetuate an impractical standard in the Welfare Code in certain circumstances.

It is submitted that the wording should include the phrase in **Minimum Standard 3** – when necessary

Thank you

Garrick Batten CAPRINEX ENTERPRISES LTD., P O BOX 102, BRIGHTWATER 7051

From: Caprinex <caprinex@xtra.co.nz>
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Flag Status: Flagged

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Thank you

Garrick Batten CAPRINEX ENTERPRISES LTD., P O BOX 102, BRIGHTWATER 7051

1346

From: Caprinex <caprinex@xtra.co.nz>
Sent: Wednesday, 27 April 2016 1:38 p.m.
To: Animal Welfare Submissions
Subject: SUBMISSION on Animal Welfare Regulations

Follow Up Flag: Follow up
Flag Status: Completed

The following submission is to clause #38 Stock transport – lame....goats

There is a parallel situation for sheep with goats, with systemic lameness, particularly with Boer and Angora goats.

While some progress has been made with genetic selection against predisposing causes, and more particularly with for example Kiko and Kikonui pastoral goats, that has and will continue to be by culling to slaughter after transport.

Goats are more mobile than sheep, and even with a severe case of footrot, are quite capable of fitting only some of the Grade 3 lameness score criteria. For these reasons, it is submitted that goats should be allowed to be transported to slaughter when carrying a significant foot problem.

It is further submitted that if an exception is to be made for sheep, as is postulated in the Consultation document, that should be extended to include goats for the same reasons.

Garrick Batten CAPRINEX ENTERPRISES LTD. P O BOX 102 BRIGHTWATER 7051

www.caprinexnz.com



SUBMISSION made on behalf of NZ MEAT GOAT INDUSTRY STRATEGY GROUP

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Caprinex <caprinex@xtra.co.nz>
Sent: Wednesday, 27 April 2016 1:38 p.m.
To: Animal Welfare Submissions
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Garrick Batten CAPRINEX ENTERPRISES LTD. P O BOX 102 BRIGHTWATER 7051

www.caprinexnz.com



SUBMISSION made on behalf of NZ MEAT GOAT INDUSTRY STRATEGY GROUP

✓ 1347

From: s 9(2)(a)
Sent: Wednesday, 27 April 2016 11:36 a.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Blue Category

Submission on Animal Welfare Regulations 2016

From Marjorie Orr,

s 9(2)(a)

Phone s 9(2)(a)

Mobile s 9(2)(a)

I am supportive of all the regulations that are proposed. They are all significant improvements and many help clarify grey areas in the previous legislation.

I am particularly pleased to see that drowning of cats and dogs is prohibited, as is use of tail twisting on cattle, and use of restrictive muzzles on dogs, and aspects of tethering of goats improved.

Bobby calf welfare is still of concern. The total time from the last feed to slaughter must be as short as possible and I hope the Regulations will ensure that no more than 12 hours will elapse, but in practice could it still be 24 hours? This is not necessary or reasonable and I suggest that some reference to the maximum time from last feed on the farm to slaughter be made.

Also I believe the time is right to ban use of exotic animals (large mammals and primates) in circuses. No circuses currently use them so pre-emptive ban would be appropriate.

Marjorie Orr 27th April, 2016

From: DEBBIE MUNRO s 9(2)(a)
Sent: Tuesday, 26 April 2016 11:31 a.m.
To: Animal Welfare Submissions
Subject: Care of conduct.

Follow Up Flag: Follow up
Flag Status: Completed

I would like to make a submission regarding Care of conduct.
Companion Cat Code

I would like to see 'Removal of kittens under the age of 8 weeks' to be a fixed rate.

This is not to be if they are 'orphaned' or without there mother.

Too many people are selling kittens under this age, using kittens mother is dead, as an excuse. They in 8 weeks you see a litter from the same 'dead' mother.

Also kittens that are orphaned need extra time around siblings, (often rescuers) for socialisation. They should NOT be allowed away from there home until 8 weeks, full stop./

Its a silly law, as orpahned kittens need more protecting.'

Debbie Munro

s 9(2)(a)

From: alastair §
Sent: Monday, 25 April 2016 12:19 p.m.
To: Animal Welfare Submissions
Subject: FW: submission Tail docking and dew claws

From: alastair [§ 9(2)(a)]
Sent: Saturday, 23 April 2016 10:30 a.m.
To: § 9(2)(a)
Subject: submission Tail docking and dew claws

' Before we decide to abolish something we need to look at why it was introduced in the first place'.
This is my submission having owned and bred Pekingese, Griffon Bruxellois, and King Charles for three decades..Thirty years of first hand experience can not be ignored as this argument needs a base to work from, rather than opinions of people, many of whom have no valued experience, but ready imput.

Having Pekingese, and King Charles Spaniels, both breeds having LARGE FULL ROUND eyes....the eyes easily get irritated by dust, dirt and wind, and although we do our best to protect them from the wider elements, we have found that nearly ALL eye injuries, regarding veterinary attention, corneal ulcers etc, have resulted from the eyes being SCRATCHED from their front dew claws..By removing dew claws of all our puppies for over two decades, I do not have any issue with eye injuries.

Likewise with Griffons, they use their dew claws for assisting their climbing ability..left on ALL of mine face risk of injury, tearing down to the tendon etc...Agin by removing the dew claws these injuries do NOT happen.

Then we have the HIND dew claws, and these are normally double on both griffons and Charlies..They grow extremely large, and where we keep our own dogs claws regularly attended too I can not say that EVER happens when gone to Pet homes..

In our Grooming salon, we have countless numbers of dogs in, with dew claws grown into full circle, embedding into their pads and legs, countless 'oodle' varieties with eye injuries again caused by dew claws..

The quick removal of dew claws on a baby puppy is NOT detrimental to its health .I am not saying that it is painless....maybe we could administer some anesthetic in that case, But the intense pain caused by a torn dew claw, or a n injured eye, lasts several weeks 9 and thats if it IS cared for) Many dogs in pet homes are NOT treated...due to the horrific expenses that some vets choose to inflict....

As for tail removal I remain pro choice Griffons, Norfolk terriers and King Charles Spaniels which I breed show and export, have always been traditionally docked breeds.

The King Charles is cursed with crooked and bent tails which resemble crank handels..Left un trimmed the kinks develop into calcified knuckles causing constant pain and discomfort..To remove the tail at an older age by surgery, is not only horrific and painfull, but it can result in extreme traumer and even death...

It is best to have a tail tidied or removed , according to the defects with its tail .

As for optional tail trimming, I personally am pro choice with this/..I have removed tails of puppies without trauma for many many years...it is only ion rescent years that I have left tails on our Griffons and Norfolks, BECAUSE they can not be shown overseas in Europe without tails, at many venues.Especially where the public pay an entry fee....we wouldn't want to see the public up set to see a dog without a full tail would we now..

Personally I prefer to see amputations preformed by a veterinarian, or an accredited person, than home surgery....but to outlaw a practice which is there to prevent an injury, is an act of cruelty in itself..

Regularly I see 'fighting' varieties of dogs, many owned by homeless people, with tails removed and ears hacked offa procedure being done by persons holding down a puppy and another slicing the ears off with a Stanley knife.....There are more important issues out there that need addressing, rather than the concerns of dew claw and tail removal, by dedicated dog breeders...

At this stage I need to express that the NZ kennel Club INC, is affiliated to the Kennel Club, UK, whose aims and objectives are for the promotion and preservation of pure bred dogs....but here again, connoisseurs, fanciers, and breeders alike, are once again being PENALISED for doing their best to prevent injuries happening in puppies they decide to raise in the future.

As a Breeder I can not guarantee the future of each and every puppy I breed, however, by removing dew claws and kinked tails, I can ascertain that injuries related to them, and painful procedures, are being reduced by the removal of dew claws and kinked tails, a few days after birth.

Yours Truthfully

Alastair Clicquot

s 9(2)(a)

✓ 1350

From: Loretta § 9(2)(a)
Sent: Saturday, 23 April 2016 8:10 a.m.
To: Animal Welfare Submissions
Subject: Submission on animal welfare regulations.

Follow Up Flag: Follow up
Flag Status: Completed

Loretta Hazel Westbrook.R.N.

§ 9(2)(a)

When considering new regulations, please ban goat tethering , these animals are cruelly treated by being tethered, often without much shelter, they are social animals and need room to move and socialism with others. Many animals in New Zealand are not valued for themselves but are seen purely as a way to make money.

Banning large farms is a good step forward, these farms do not see animals as thinking, feeling creatures, but purely as a money making enterprise.

The chicken new crates are an absolute disgrace, barely room for chickens to move, and free range should be made to be that not a small escape hole at the end of a large crowded barn.

Home kills are done without any stunning so the animals are terrified and fully conscious.

Halal should be banned, why do we allow this terribly cruel way of killing just to have monetary gain.

My hope is that one day people will value animals as simply other life forms we share the planet with and we will no longer enslave and use and abuse them.
The above suggestions are a tiny step in this direction.

Loretta Hazel Westbrook

From: Stuart Davison s 9(2)(a)
Sent: Saturday, 23 April 2016 7:55 a.m.
To: Animal Welfare Submissions
Subject: Submission on animal welfare regulations

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Blue Category

To whom it may concern,

Most of the proposed changes to the regulations are good, and agreeing with what the article says, should already be minimum standards. For example, standardising "bobby calves" regulations.

However, to enforce changes during a "low payout" season and possibly the following season (2016 calving) will effect dairy farmers directly. As any company that this change of regulation affects will pass on cost directly to the farmer. A gradual change needs to happen to allow farmers to deal with the added financial pressures that will follow from these changes.

Stuart Davison,

s 9(2)(a)

s 9(2)(a)

1352

From: Shelley Krieger s 9(2)(a)
Sent: Friday, 22 April 2016 8:45 p.m.
To: Animal Welfare Submissions
Subject: Submission on animal welfare regulation

Follow Up Flag: Follow up
Flag Status: Completed

Regarding the dehorning of cattle.

The rules and regulations regarding this are good as they are.

We have tried the anaesthetic route with our heifer calves and had the vets come in. The calves have to endure 5 injections each, 1 in the rump and one on each side of each horn.

When they wake up they are in pain and hang their heads down for the rest of the day, sometimes for 2 days.

When we have them dehorned quickly by a dehorner with gas tools the calves are back happy and feeding straight away with no ill effect.

I know that in theory anaesthetic is seen to be more humane but on the ground floor where it counts the harm to the calves is greater.

For older cattle we all know that anaesthetics have to be used, and from my job as a dairy stock agent as well as a dairy farmer I would say that everyone I deal with is aware of these regulations, so I personally don't think that any more regulations need to be added.

Shelley Krieger

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

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✓ 1353

From: Nigel Wilson s 9(2)(a)
Sent: Wednesday, 20 April 2016 8:19 p.m.
To: Animal Welfare Submissions
Subject: Animal welfare regulation

Hi there, I would like to express my view of the proposed changes in animal welfare regulations.

I don't believe these changes go far enough in protecting the most vulnerable amongst us. I feel our standards should be at least as high as those set by the EU for protection of animals in Europe.

I would also specifically like to call out the lack of protection given to animals - especially dogs and goats - from people who want to leave them chained up for long periods of time.

I feel that the job we currently do as a country in looking after our animals is poor, and while the proposed changes include some positive steps, that do not go nearly far enough to allow us to take pride in our law and our collective behaviour.

Thanks for the opportunity to make this submission.

Nigel Wilson

s 9(2)(a)

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✓

1354

From: Miles Lamare s 9(2)(a)
Sent: Tuesday, 19 April 2016 11:33 a.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Legislation Changes

Follow Up Flag: Follow up
Flag Status: Completed

I am submitting my concerns on the Animal welfare policy legislation changes.
I feel that without an independent voice for animals, these changes that are being proposed are not good enough. Ministry for Primary Industries has a vested interest, as the animal agriculture sector is a vital part of New Zealand's economy. It is only just and fair that if animals are to be the product, that creates jobs and profit, they should have an independent voice in terms of their wellbeing and welfare, while they are within this system. We are well behind a lot of other countries with our animal welfare. Even in New Zealand we have recognised our animals as sentient beings. But we are not putting this into practice.
Until we have an independent non farming biased watchdog, sub standard conditions will continue to be the norm for our animals.
Thank you.
Kelli Lamare

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

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From: Mark Blanchfield <§ 9(2)(a)>
Sent: Tuesday, 19 April 2016 9:42 a.m.
To: Animal Welfare Submissions
Subject: Submissions on Animal Welfare Regulations
Attachments: Submission on Animal Welfare Regulations.pdf

Follow Up Flag: Follow up
Flag Status: Completed

To whom it may concern,
Please find Submission attached below.

Kind regards,
Mark Blanchfield

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Submission on Animal Welfare Regulations

19 April 2016.

I would like to make a private submission regarding the consultation document
Proposed Animal Welfare Regulations (Care & Conduct & Surgical & Painful Procedures)

In General.

Any legislation that is for the welfare of animals against cruelty or suffering can only be seen as a good idea. No responsible animal handler wants to see any of their animals under their charge or someone else's charge suffer unnecessarily.

In general terms the proposals look to be reasonable and fair. I do however see some points that will cause some alarm to animal handlers throughout the country.

I do notice the organisations who have helped to propose the changes to the document are known for their bias, and I believe that by only including the NAWAC, RNZSPCA and the Vet Council, that it is possible that the proposals may be lacking some balance.

Some of the newly proposed legislations potentially turn simple procedures by suitable experienced people into procedures to be carried out by Vets or Vet trainees. Further to this it makes it possible for prosecution and in some instances criminal charges.

This will be adding further financial burdens to some of the handlers, and if they are prosecuted could potentially turn normally law abiding handlers into criminals.

For this reason I would like to see more direct input from other organisations and groups such as Federated Farmers and Breeders. It should be expected that people who have worked and cared for the various breeds with their extensive knowledge would more direct input on the sensibilities of some of these proposals. I also note that there are more issues that need to be worked through than has been highlighted in Blue in the document, which MPI may have over looked.

In Particular.

Although I have read the document I wish only to comment directly regarding Dogs, as I am a dog owner and enthusiast, and feel qualified only to speak about these proposed changes.

12.0 Surgical and Painful Procedures Regulatory Proposals.

61. Dogs – Dew Claws.

In the wording "Must only be performed for therapeutic reason" does not go far enough to cover the necessities of this procedure. Many Working, Hunting and Agility dogs suffer from having a dew claw ripped off, partially torn away from the vigour's of carrying out their work or duties.

It must be an option to have the Dew Claws removed at a young age if they are deemed by the breeder, owner or Vet to be at risk of causing injury to a dog later in its life.

I have experienced this with a hunting dog climbing rocks in a creek and it was painful for the dog involved and stressful for the dog and myself. This can be sensibly avoided by the simple procedure.

It would be remiss to not allow this option.

62. Dogs – Tail Docking.

The existing regulations are suffice, but in the new proposal the wording "Must only be performed for therapeutic reason" does not go far enough to cover the necessities of this procedure. Some of the reasons that hunting and working dogs have this procedure done is for the long term welfare of the ends of their tails. NZ has particularly thick, and thorny areas these dogs work and they are prone to tearing the ends of the tails away. This injury never really heals up that well and once it happens they are prone to further injury when working.

The way the proposed changes are worded it reads that a dog owner must wait until his dog has an injured tail before the procedure can be done. For most dogs this would be from a year onwards, making it total unnecessary and involving a traumatic visit to the vet, not to mention another financial burden.

A hunting dog can at times become ineffectual if they are prone to wagging of the tail in cover which could alert or flush the object of the dog's attention.

The breeds that have their tails docked have had them done so for many years and shown that the procedure does not affect the animal in later life, and are beneficial to the dog's welfare and function. I believe that the breeds with docked tails should be able to continue to be so, and to let the breed retain the desired look.

MPI must seek more direct input from Dog breeders regarding the appearance of their breeds. Not enough emphasis has been allowed for breed appearance and function in this proposal.

It is interesting to note that you approve of Lambs having their tails docked, at a much older age than a dog and this is considered to be Ok, This appears to be a double standard, if MPI are concerned about the pain caused by this procedure. Docking a dog's tail when it is less than four days old would be far less traumatic than docking a lamb's tail when it is six months or less.

Thank you for the opportunity to comment and place a submission on the proposed changes.

Sincerely,

Mark Blanchfield.

s 9(2)(a)

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✓ 1356

From: julian wilson s 9(2)(a)
Sent: Tuesday, 19 April 2016 9:41 a.m.
To: Animal Welfare Submissions
Subject: submission

Follow Up Flag: Follow up
Flag Status: Completed

ban tail docking in pups...unacceptable & unnecessary mutilation + painful procedure
allow tail docking for treatment of pathology in older dogs under general anaesthesia

Dr J Wilson BVetMed MRCVS

s 9(2)(a)

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From: Darin Grenz s 9(2)(a)
Sent: Tuesday, 19 April 2016 7:19 a.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Follow Up Flag: Follow up
Flag Status: Completed

In regards to tail docking, please allow the practice to continue in breeds for which tail docking is part of the breed standard (tradition).

The practice has existed for generations, is not traumatic when performed at a young age, and has benefits for the working breeds to which it applies.

Darin Grenz
s 9(2)(a)

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1358

From: Sue Williams s 9(2)(a)
Sent: Monday, 18 April 2016 12:57 p.m.
To: Animal Welfare Submissions
Subject: animal welfare submission

Follow Up Flag: Follow up
Flag Status: Completed

I would like to make a submission on the proposed Animal Welfare Act.

Sue Williams

s 9(2)(a)

I would like to support:

Article 4-Pinch and prong collars. As a professional trainer since 1992 I would like to support the article that will prohibit the use of pinch and prong collars, they are a barbaric and unnecessary device that the dog cannot escape from which cause pain and stress with their use. As all training now should be reward based there is no longer a valid reason to use them.

Article 62: Tail docking. I would like to support the ban on tail docking in dogs, it is an old fashioned and out-dated practice, I have seen several instances of dogs not being able to communicate properly with other dogs through not having tails and they are an aid to balance. I think that the argument for docking hunting dogs is misguided, I have never had a tail injury in any of the spaniels we have owned, and breeders dogs who do have tail injuries can select for better tails to stop tail injuries once the Act is passed.

Thank you
Kindest Regards,
Sue Williams

s 9(2)(a)

From: Jan Hall s 9(2)(a)
Sent: Sunday, 17 April 2016 3:37 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations'

Follow Up Flag: Follow up
Flag Status: Completed

I would suggest the banning of the forcibly imposed hyperflexion of a horse's head and neck known as "rollkur".

Forcibly imposed hyperflexion is allowed for a maximum of 10 minutes before competition by both the FEI and, following the FEI's direction, ESNZ. With respect I suggest that this somewhat shabby lenience is driven more by political and financial motives than by any attention to the welfare of the tortured horse.

Below is the recorded result of a submission by the University of Sydney's Professor Paul McGreevy to the last conference of the International Society for Equitation Science held in Vancouver in 2015. Professor McGreevy's evidence that 'rollkur' is cruel is incontrovertible.

"International Society for Equitation Science

A position statement was introduced to delegates at (the 2015) ISES conference in Vancouver, Canada, by the University of Sydney's Professor Paul McGreevy, a specialist in veterinary behavioural medicine with a special interest in animal welfare and equitation science.

The society said riders, trainers and sports officials must be aware of the gradual effect of flexion on horse welfare and ensure that head and neck postures did not compromise physiological or psychological function.

When balancing the gymnastic effects with the evident costs of impairing equine welfare, there remains little reason why the use of extreme/hyperflexed head and neck postures in equine training should be considered an acceptable practice."

"Maintaining an open airway and ensuring the horse is self-maintaining the posture (rather than it being enforced by the rider/trainer and/or tack or equipment) are essential," it said.

"Extreme or hyperflexed head and neck postures are not acceptable."

I am the SPCA member on one of NAEC's National Animal Ethics Committees with years of experience in estimating pain levels and monitoring and adjudicating experiments upon animals. If I were to use the NAEC gradings of A (no impact), B (little impact), C (moderate impact), D (high impact), and E (Very high impact) of "rollkur" upon a horse, I would unhesitatingly use an E grading based upon ISES's report.

The long term adverse effects of "rollkur" (hyperflexion) upon a horse are surely equal to those of poor fitting tack.

Regards,

JAN HALL BA, PG Dip.Bus.Admin.

§ 9(2)(a)

Mob: § 9(2)(a)

Landline: § 9(2)(a)

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From: Tim McGowan § 9(2)(a)
Sent: Sunday, 17 April 2016 3:34 p.m.
To: Animal Welfare Submissions
Subject: Proposed changes to the Animal Welfare Regulations Submission re the proposed changes regarding tail docking and dew claw removal in dogs

Follow Up Flag: Follow up
Flag Status: Completed

Tail docking

Tail docking in pups should not be included in this proposal as the pain in removing a 3-4 day old pup by a vet is probably less painful than cutting your finger and in the case of the working dogs I have had they have shown no ongoing stress or behavioral problems as they mature because their tails have been docked .

Working dogs eg spaniels with undocked tails are prone to thorn damage while working heavy cover and end the day with a painful bleeding tail and for this reason I believe that this regulation should not be changed, to do so and allow the dog to suffer in these situations is a cruelty in its self.

Dew claw removal in dogs.

Have you ever seen a dog with a ripped dew claw?, its not a pretty sight and must be as painful to the dog as having one of our finger nails pulled out, again this would be a very cruel amendment to the existing regulation if this change was to be implemented and included working dogs!

In general I accept the proposed changes to the AWR which I am sure are the result of the TV programme on handling of bobby calves but it must be sensible and constructive and not a wish list from some 'over the top' animal welfare organisation.

Thank you
Tim McGowan

✓ 1361

From: Cameron Henderson s 9(2)(a)
Sent: Sunday, 17 April 2016 2:26 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulation

Follow Up Flag: Follow up
Flag Status: Completed

Cameron Henderson
s 9(2)(a)

Section 10.2 Proposal 3 - Twisting a animals tail

While I agree with all other proposals related to cattle - this proposal removes a necessary technique for getting large animals to move when they are being stubborn. Many cattle beasts are too large to manhandle and an electric prodder is not always available. Unnecessary tail twisting or tail twisting that causes permanant damage should be disallowed but minor, non damaging pain is sometimes required to move large animals particularly in yards. TSmaller animals that can be moved by human force should never have their tails twisted.

regards

Cam Henderson

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From: Amira § 9(2)(a)
Sent: Sunday, 17 April 2016 2:10 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Follow Up Flag: Follow up
Flag Status: Completed

To: The Primary Production Committee

My name is Amira Brock and I am writing to express my deep concern and dismay about the practise of tethering goats on roadsides.

I ask that this appalling practise is banned in New Zealand, in line with other enlightened countries such as Austria and Switzerland.

Goats are social animals and suffer terribly when undergoing the equivalent of life-long solitary confinement in a prison, as happens when tethered alone for their entire life. They also need to be able to move freely to express their natural behaviour and have a healthy life.

When tethered at the side of a road they are at risk of abuse from people and dog attacks. They suffer from malnourishment as grass alone does not provide all the nutrients that goats need, and are at risk of strangulation from their tether.

I find it morally repugnant that the basic welfare needs of these animals are ignored by our government. To propose a mere \$300 fine for animal abuse that induces significant, life-long mental and physical torment can only indicate an alarming lack of ethical consideration in this situation.

There is an abundance of evidence to show that a great number of goat owners cannot or will not provide a properly fenced paddock with adequate all-weather housing (goats have very little fat and suffer from being wet and cold), meet the nutritional requirements of their animals, and provide some form of social contact for these intelligent and social herd animals. To ban roadside goat-tethering would be the minimum requirement in sending a clear message to animal owners in New Zealand.

That message is:

In New Zealand you are expected to look after your animals and properly provide for all of their needs. It becomes a serious situation if you do not look after your animals properly, with serious consequences attached. New Zealand's legislation needs to reflect a high standard on matters of ethics, and prioritising excellent quality of life for animals is at the core of a truly civilised and educated society.

Sending the opposite message by allowing people to use goats as "lawn-mowers" in rural areas is short-sighted. In my view, keeping grass short by tethering a goat is human laziness expressed through animal cruelty. It seems a barbaric and very backward custom to me because there are so many excellently designed devices available for cutting grass and scrub. As the part owner of a small rural property I can attest that we keep our grass down by using mechanical devices, not a sentient being attached to a chain and a life of misery. There are also companies and self-employed people offering services to perform these tasks for property owners, which would help with rural job creation.

The cruel and very ignorant habit of roadside goat-tethering in an educated, progressive country has surely reached it's use-by date.

Yours faithfully,

Amira Brock

s 9(2)(a)

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ph s 9(2)(a)

This email has been checked for viruses by Avast antivirus software.

<https://www.avast.com/antivirus>

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✓ 1363

From: s 9(2)(a)
Sent: Sunday, 17 April 2016 6:39 a.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Follow Up Flag: Follow up
Flag Status: Completed

TO THE PRIMARY PRODUCTION COMMITTEE

I, Kimberley Carter am the principal petitioner of Petition 2014/23 requesting that;

“the House note that 7,329 people have signed petitions requesting that Parliament prohibit the tethering of goats on roadsides and requesting that an enforceable code of welfare be developed to provide for their needs.”

The following is my written submission in support of this petition and I would like to thank the committee for giving me the opportunity to do so.

Having lived in New Zealand for nearly eight years I have been appalled and very upset every time I see a lonely goat chained up for the purposes of being a cheap weedkiller. These are highly social animals, being chained all their lives sometimes scared and definitely lonely at the side of roads or anywhere else is disgusting. No sentient being should be subjected to such a fate. Its disgraceful and very upsetting to see. Im sure the countless tourists such as I was before moving there are astounded by the cruelty of this act especially as it is illegal to do this in other countries. No animal, whether a social herd animal or otherwise should be subjected to this horrible life which often goes hand in hand with neglect. I sincerely hope you can make this illegal. I may no longer live in New Zealand for family reasons but my daughter is a kiwi by birth and we are by citizenship. We adopted your beautiful country but not the barbaric animal welfare that exists there.

Yours sincerely

Kimberley Carter

Sent from my iPad

✓ 1364

From: Arnold Chamove § 9(2)(a)
Sent: Saturday, 16 April 2016 5:40 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Follow Up Flag: Follow up
Flag Status: Completed

I suggest you consider a ban on the shaving of horses' whiskers, the inside of horses' ears, and eye lashes.

My research on horses and on mice suggest that whiskers are important to feeding, and their removal causes injury to the animal.

Arnold Shirek Chamove BA, MA, MSc, MPhil, PhD, FIBiol, DSc

§ 9(2)(a)

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From: Paul Coles s 9(2)(a)
Sent: Saturday, 16 April 2016 4:44 p.m.
To: Animal Welfare Submissions
Subject: Feedback on the tethering of goats

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/madam

I am writing to express my disappointment in the provisions of the new act regarding the above.

Goats are by nature a herd animal, and to allow them to be tethered alone is no different to the caging of chickens. In this day and age it is simply not acceptable. I strongly urge you to amend the proposed legislation to make this act illegal.

Kind regards

Paul Coles

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From: Julian Shorten s 9(2)(a)
Sent: Saturday, 16 April 2016 4:12 p.m.
To: Animal Welfare Submissions
Subject: Surgical or painful procedures.

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/Madame

There is no doubt dental procedures (extraction of wolf teeth or diseased incisors or molars) have the potential to cause pain and lasting harm (eg inadvertently opening up a pulp cavity whilst floating teeth in the equine) if undertaken by poorly or untrained operators.

Removal of diseased teeth requires regional or local anaesthesia, a sound knowledge of anatomy, and the ability to safely sedate or provide general anaesthesia.

That makes equine dentistry a veterinary procedure and as such it should only proceed when performed by a duly trained veterinarian.

Yours Faithfully

R J Shorten BVMS

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✓ 1367

From: Irina Lylova § 9(2)(a)
Sent: Saturday, 16 April 2016 3:37 p.m.
To: Animal Welfare Submissions
Subject: Submissions for proposed animal welfare regulations

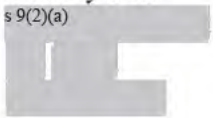
Follow Up Flag: Follow up
Flag Status: Completed

Hello,

Could you please ban the tethering of goats? It is cruel and unnecessary. The proposed \$300 fine is not enough. This abuse is not something that should be part of beautiful NZ countryside.

Regards,

Irina lylova
§ 9(2)(a)



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(1368)

From: Abi Mercury s 9(2)(a)
Sent: Saturday, 16 April 2016 2:45 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations: Section 13. Goats - Tethering

Follow Up Flag: Follow up
Flag Status: Completed

13. Goats – Tethering requirements

NO animal should be tethered for any prolonged length of time. It is unacceptable, cruel and causes unnecessary suffering to an animal's welfare.

Tethered animals are restricted in their ability to seek out food, water, and dry shelter sufficient to meet their needs. Goats are more susceptible to hypothermia than sheep due to differences in the distribution of their fat and the consistency of their coat. This is especially so when wet.

Goats are not a lawnmower. There is no situation that requires a goat to be tethered long term aside from a lazy, irresponsible animal owner who has no genuine care for the animal.

Goats, alongside dogs and horses are social animals. Therefore tethering a goat, dog or horse alone for an extended period of time, i.e. days, months, years, is cruel in itself due to their proven social nature.

No animal should be tied up and left alone, unable to fend for themselves. Stricter regulations on tethering would allow for those who see goats as a lawnmower to not use them in this practice on road sides and other lonely, dangerous areas.

I fully reject the existing proposal that relies on shelter, food and water as acceptable outcomes for a tethered goat. These should all be provided, but in a paddock with other goats. Tethering, just like branding an animal with a hot iron is outdated and archaic and no longer has any standing in our society where animals are valued for their contribution to our society.

A \$300 fine is an insufficient penalty for animal cruelty and there would need to be a more serious stance taken on animal

offending where serious harm is inflicted. Such as jail time, removal of ability to own animals and an amount for a fine that deters, such as \$2000. These would be suitable for serious harm/abuse such as leaving a goat sick and malnourished, violent abuse or damage to a goat's well being through solitary confinement.

New Zealand has a long history of lenience in legal punishment for crimes against humans, let alone animals. It is time we start seriously valuing those who do not have a voice or are powerless to defend themselves against cruelty. Tethering of animals for prolonged periods of time must be made illegal.

Goats require freedom to roam, graze and socialise. They need a sufficient shelter they can sit under when it is cold and wet. Anyone who has come into actual contact with these animals would know that. Those using them as grazing lawnmowers are not suitable owners and these animals should be rehomed.

To accept anything less is to accept these animals as a non-entity, when this is not the case.

Out of Scope

✓

1369

From: Sandra Greenwood <mastiffbreedsrescue@xtra.co.nz>
Sent: Saturday, 16 April 2016 2:30 p.m.
To: Animal Welfare Submissions
Subject: 'Submission on Animal Welfare Regulations'

Follow Up Flag: Follow up
Flag Status: Completed

Sandra Greenwood
Mastiff Breeds rescue and rehome charitable trust
s 9(2)(a)

mastiffbreedsrescue@xtra.co.nz
s 9(2)(a)

Proposal for amendment to Dogs welfare code

A need for regulation regarding the minimum age for puppies to be parted from their mother / sold / given away etc

Currently it is a sad reflection on the lack of human understanding and common sense that this is needed . The code was amended for 2007 which covers kittens but not puppies. I would love to see this amended and put in as a rule

Kindest Regards
Sandra Greenwood

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From: Helen Gilbert s 9(2)(a)
Sent: Friday, 15 April 2016 10:45 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Follow Up Flag: Follow up
Flag Status: Completed

Dogs left in vehicles

MPI Consultation		My submission
Proposal	<p>A person leaving a dog in a vehicle must ensure the dog does not display symptoms consistent with heat stress such as any or a combination of:</p> <ul style="list-style-type: none"> - hyperventilation; - excessive panting; - excessive drooling; - lethargy, weakness, or collapse; and - non-responsive to attempts to check a dog's alertness 	<p>This is good and I support it.</p> <p>The regulations must be about <u>actual effects</u> (as indicated in Leaving a dog in a car carries the <i>risk</i> of the effects but does</p> <ul style="list-style-type: none"> • the owner is absent for a very brief time • the vehicle may have an effective and operative cooling s <p>For example, my dog prefers to come with me when I am out of heat stress. I mitigate that risk with a number of actions including letting the dog have a run at a park between errands, carrying in supermarkets).</p> <p>There is still the <u>risk</u> of heat stress, but my dog has never experienced</p> <p>I have laboured this point because the Consultation Document risks - see below "How regulation will help".</p>
Current state	<p>Dogs code of welfare 2010 Minimum Standard 20 - Transportation (e) Dogs must not be left unattended in a vehicle in conditions where the dog is likely to suffer from heat stress.</p>	
What is the problem?	<p>Dogs suffering from heat stress can suffer pain and distress and ultimately die.</p> <p>An identified area of frequent non-compliance. It is estimated from available data that there are around 300 complaints per year relating to dogs locked in vehicles.</p> <p>Current enforcement responses appear ineffective at deterring frequent offending. Injury and distress has to be severe, in this case the death of a dog, before prosecution under the Act.</p>	
How will regulation help?	<p>Will provide clarity that leaving a dog in a vehicle at risk of heat stress is unacceptable.</p> <p>Will provide an enforcement response proportionate to the offence.</p> <p>Will provide a more effective deterrent.</p> <p>Actions that breach this proposal are unlikely to be deliberate. Education may be more appropriate but that needs to be balanced by the high risk to a dog's welfare.</p>	<p>This description of how regulation will help is inconsistent with description is about <u>the risk</u> of effects.</p> <p>Leaving a dog in a car carries the risk of the effects but does</p> <p>The regulations must be about <u>actual effects</u> (as indicated in</p>
Penalty	<p>The penalty attached to this regulation could be either</p> <p>An infringement offence with a fee of \$500. No criminal conviction;</p> <p>or,</p> <p>A prosecutable regulation offence. Can include a criminal conviction. Maximum penalty fine of \$5,000 for an individual, \$25,000 for a body corporate.</p>	<p>For first (and second?) offences, the infringement offences seem</p> <p>For repeat offenders, a higher level of sanction seems to be required</p>

Additional questions and information	<p>Refer to the general questions set out in section 9.1 and 10.1.</p> <p>In addition, please also consider the following questions:</p> <p>Does the offence deal with sufficiently straight forward issues of fact to be an infringement offence (see section 4.1.1)?</p> <p>If not, what could be changed to make it clearer?</p> <p>If it cannot be made clearer, would a prosecutable regulation offence be appropriate?</p> <p>Is the risk of an infringement going to be a stronger deterrent factor than the risk of harm to the dog?</p> <p>Is an infringement appropriate in this situation?</p>	<p>Is the risk of infringement a stronger deterrent factor than risk of harm to the dog?</p> <p>It depends on the owner... dog owners are not homogeneous. The intention is to increase the basic standard. If that is so, then the answer is yes, but I do not see any evidence that MPI plans to support that.</p>
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Helen Gilbert
s 9(2)(a)

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Out of Scope

To: Out of Scope
Subject: RE: Submission on Animal Welfare Regulations

Out of Scope | Senior Policy Analyst
Biosecurity, Food & Animal Welfare Policy | Policy and Trade Branch
Ministry for Primary Industries - Manatū Ahu Matua | Pastoral House 25 The Terrace | PO Box 2526 | Wellington | New Zealand
Telephone: Out of Scope | Web: www.mpi.govt.nz

"A pessimist sees the difficulty in every opportunity; an optimist sees the opportunity in every difficulty." - Winston Churchill

From: Out of Scope
Sent: Monday, 15 August 2016 4:51 p.m.
To: Out of Scope
Subject: FW: Submission on Animal Welfare Regulations

From: § 9(2)(a) [mailto:§ 9(2)(a)]
Sent: Friday, 15 April 2016 10:45 p.m.
To: Animal Welfare Submissions <Animal.WelfareSubmissions@mpi.govt.nz>
Subject: Submission on Animal Welfare Regulations

Dogs left in vehicles

MPI Consultation		My submission
Proposal	A person leaving a dog in a vehicle must ensure the dog does not display symptoms consistent with heat stress such as any or a combination of: <ul style="list-style-type: none">- hyperventilation;- excessive panting;- excessive drooling;- lethargy, weakness, or collapse; and- non-responsive to attempts to check a dog's alertness	This is good and I support it. The regulations must be about <u>actual effects</u> (as indicated in the proposal) and NOT about the risk of effects. Leaving a dog in a car carries the <i>risk</i> of the effects but does not mean the dog will actually get heat stress. It would be possible that: <ul style="list-style-type: none">• the owner is absent for a very brief time• the vehicle may have an effective and operative cooling system. For example, my dog prefers to come with me when I am out in the car on errands, rather than staying home alone. That means there is some risk of heat stress. I mitigate that risk with a number of actions including parking

		<p>in shade, being away from the car for relatively short periods of time, letting the dog have a run at a park between errands, carrying and providing drinking water, using underground car parks where practicable (e.g., supermarkets). There is still the <u>risk</u> of heat stress, but my dog has never appeared to get it because of the ways I mitigate the risk.</p> <p>I have laboured this point because the Consultation Document is confused about whether MPI's intention is to address actual effects or to manage risks - see below "How regulation will help".</p>
Current state	<p>Dogs code of welfare 2010</p> <p>Minimum Standard 20 - Transportation</p> <p>(e) Dogs must not be left unattended in a vehicle in conditions where the dog is likely to suffer from heat stress.</p>	
What is the problem?	<p>Dogs suffering from heat stress can suffer pain and distress and ultimately die.</p> <p>An identified area of frequent non-compliance. It is estimated from available data that there are around 300 complaints per year relating to dogs locked in vehicles.</p> <p>Current enforcement responses appear ineffective at deterring frequent offending. Injury and distress has to be severe, in this case the death of a dog, before prosecution under the Act.</p>	
How will regulation help?	<p>Will provide clarity that leaving a dog in a vehicle at risk of heat stress is unacceptable.</p> <p>Will provide an enforcement response proportionate to the offence.</p> <p>Will provide a more effective deterrent.</p> <p>Actions that breach this proposal are unlikely to be deliberate. Education may be more appropriate but that needs to be balanced by the high risk to a dog's welfare.</p>	<p>This description of how regulation will help is inconsistent with the proposal. The proposal addresses actual effects (hyperventilation, etc), but this description is about <u>the risk</u> of effects.</p> <p>Leaving a dog in a car carries the risk of the effects but does not mean the dog will actually get heat stress.</p> <p>The regulations must be about <u>actual effects</u> (as indicated in the proposal) and NOT about the risk of effects.</p>
Penalty	<p>The penalty attached to this regulation could be either</p> <p>An infringement offence with a fee of \$500. No criminal conviction;</p> <p>or,</p> <p>A prosecutable regulation offence. Can include a criminal conviction. Maximum penalty fine of \$5,000 for an individual, \$25,000 for a body corporate.</p>	<p>For first (and second?) offences, the infringement offences seem appropriate.</p> <p>For repeat offenders, a higher level of sanction seems to be necessary.</p>

Additional questions and information	<p>Refer to the general questions set out in section 9.1 and 10.1.</p> <p>In addition, please also consider the following questions:</p> <p>Does the offence deal with sufficiently straight forward issues of fact to be an infringement offence (see section 4.1.1)?</p> <p>If not, what could be changed to make it clearer?</p> <p>If it cannot be made clearer, would a prosecutable regulation offence be appropriate?</p> <p>Is the risk of an infringement going to be a stronger deterrent factor than the risk of harm to the dog?</p> <p>Is an infringement appropriate in this situation?</p>	<p>Is the risk of infringement a stronger deterrent factor than risk of harm to the dog?</p> <p>It depends on the owner... dog owners are not homogeneous, and have different views on appropriate standards of care. It seems that MPI's intention is to increase the basic standard. If that is so, then infringements should be only part of the solution – education should be the other prong, but I do not see any evidence that MPI plans to support additional education around the new standards.</p>
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Helen Gilbert
Tel s 9(2)(a)

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From: Angela Mackie s 9(2)(a)
Sent: Friday, 15 April 2016 3:43 p.m.
To: Animal Welfare Submissions
Subject: 'Submission on Animal Welfare Regulations'

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir,

I read with interest proposals for the above.

I would like to suggest an addition. In some countries now it is illegal to cut or trim the whiskers of a horse as research has shown the horse uses these whiskers to determine the safety or otherwise of an object. You will see horses who seem to bump with their nose into their feed bins as they do not have the whiskers to determine the object. Most people think the horse is sniffing the object but in actual fact the first signal to the horse is given by the sensitive whiskers. This is relatively recent knowledge but it needs to be spread out far and wide as I have heard of judges who will down grade a show horse if their whiskers are not trimmed. It is actually an unnecessary and harmful procedure for the horse.

Yours sincerely,
Angela Mackie

Dr Angela Mackie

s 9(2)(a)

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✓ (1372)

From: Lois Stone s 9(2)(a)
Sent: Friday, 15 April 2016 3:31 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Follow Up Flag: Follow up
Flag Status: Completed

To whom it may concern

I wish to express my opinion that I absolutely support the proposed animal welfare regulations.

As the proposal itself says, "Animal welfare matters. It's important to animals, it's important to us as a society, and it's important to our economy."

The legal field has taken a strong interest in the area of Animal Welfare in recent times, in particular with the establishment of the NZ Animal Law Association and I am an avid supporter of this society. Raising awareness of the important of animal welfare is one thing but implementing higher penalties for breaching animal welfare regulations is another and is what is ultimately going to deter people from breaching these regulations.

Animals will never be protected enough in my opinion but any step towards stricter regulations is a positive one.

Thank you for taking the time to consider this submission.

Please note that this submission is on behalf of me personally, and not s 9(2)(a) Lawyers.

Kind regards

Lois Stone | Associate

s 9(2)(a)

[Redacted signature block]

RELEASE UNDER THE OFFICIAL INFORMATION ACT 1982

From: Hugh Rose s 9(2)(a)
Sent: Friday, 15 April 2016 2:00 p.m.
To: Animal Welfare Policy
Subject: Proposed changes to the animal welfare act

Dear Sirs

Looking at the proposed changes in regard to tethering dogs on vehicles whilst on public roads and dehorning of animals.

A trained working dog should be trained to be staying on the back of the vehicle without tethering and in the case of a motorcycle it would be downright dangerous to tether them.

I oppose this suggestion as many properties are "worked" from the public road and I certainly have never lost any experienced dog off the back of my vehicles or know anybody who has. On the other hand an untrained dog? well that is an entirely different matter.

I have written to my vet asking as to what way I may be permitted to apply as pain relief to animals about to be dehorned. At the time of writing he has not responded however a local injection will cause stress as does any handling of animals that are used to relative freedom. In the time it has taken me to write this submission a number of animals could have been dehorned and would be eating grass once more.
less handling is key to a stress free environment and the less chemicals the better.

Kind regards

Hugh Rose
s 9(2)(a)

✓ 1374

From: Kate Melzer s 9(2)(a)
Sent: Thursday, 14 April 2016 6:51 p.m.
To: Animal Welfare Submissions
Subject: my 10 cents

Follow Up Flag: Follow up
Flag Status: Completed

Hi MPI,

I want to submit the radical idea that hens jammed in cages, standing on wire all their lives is barbaric and hardly ethical or I imagine comfortable given they roost on things thicker than 2mm.

Pigs in stalls forced to lie down and unable to turn around, living in artificial light and lying on concrete is a repeat offender of appalling treatment.

I like that you recognise there needs to be change and I'm surprised these 2 awful farming practices still exist.

I am a meat eater. I choose free range chicken and pork or go without and organic where possible. I like to know that animals being raised for consumption have had as good a life as possible, I think it best it can turn, scratch, forage, play etc with others in all sorts of weather.

I would to think that NZ freezing works employ the quickest and most effective kill possible to animal. I'm aware that twitching occurs as an animal dies but unnecessary prolonged death should be outlawed.

I would like to think that farmers don't cut tails - I know they have a limit but they still trim the hair on a cow tail too short and it's the hairy end that enables insects be swiped. Too bad for dairy milkers that the tail gets poo on it - shit happens.

And dogs on chains - the acceptable level is too high, fenced yards are better than chains and enable the dog to sit in places it decides not where the owner places it.

Regards,
Kate Melzer.

1375

From: Pia Carpenter s 9(2)(a)
Sent: Thursday, 14 April 2016 6:09 p.m.
To: Animal Welfare Submissions
Subject: Submission

Follow Up Flag: Follow up
Flag Status: Completed

I completely and whole heartedly agree with all the proposed changes to make animal welfare standards better and more humane.

Regards

Pia Carpenter

s 9(2)(a)

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From: Shelly Turner s 9(2)(a)
Sent: Thursday, 19 May 2016 5:01 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

#901
376

Please find below my feedback in regards to the Animal Welfare Regulations under consultation...

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. Allowing exceptions would belittle any ban.

This proposal should be widened to include the use of ALL shock collars. It could 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 is 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.

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).

Thank you.

Shelly

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From: Claire McRae s 9(2)(a)
Sent: Thursday, 19 May 2016 5:00 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

To whom it may concern,

The proposed regulation I would like to address is number 17, 'Layer Hens - Opportunity to express their natural behaviours in housing systems'. I am addressing this proposal in particular because its implementation will have an extremely negative impact on a vast number of animals.

I note that MPI consider colony cages to meet the requirements specified in (a) of Proposal 17. That is, that hens in colony cage systems have the opportunity to express a range of normal behaviours. This is simply not true. Below I will outline some of the issues with colony cages:

- The 'nesting boxes' provided in colony cages can hardly be described as such. Hanging flaps of plastic are a poor imitation of the type of nest a hen would make in the wild. In addition, the privacy these 'nesting boxes' provide are next to none.
- Whilst colony cages do have perches, these are too low to the ground to be perceived as safe for hens, especially for those living in such cramped conditions.
- There would be no need for a scratch pad in the first place if hens could walk on the ground. A wire cage floor is completely unacceptable as the surface on which these hens will spend most of their lives.
- The equipment provided for dust-bathing is again, a poor replica of what these animals would naturally prefer.

On top of the inadequacies of these 'enrichments', there are other ways in which colony cages are very cruel. It goes without saying that restricting an animal to a cage for their entire life is abusive, especially when this confinement is completely unnecessary. If confining cats and dogs in such a way is unacceptable, so too is the confinement of chickens. Moreover, these birds do not get to roam outside, feel the sun on their feathers, or have sufficient space.

I strongly advise against the implementation of colony cages. Firstly, because they do not comply with sections 10 and 11 of the Animal Welfare Act. Standard battery cages have likewise breached these sections since 1999 when the Act came into force. Instead of introducing another caged system which does not comply with the Act, New Zealand should be looking to (at the very least) comply with it's own animal welfare legislation.

Not only will the implementation of colony cages seriously compromise animal welfare, I predict they will also be a financial disaster. Public pressure from both New Zealanders and from around the world against factory farming is growing. Thus all caged systems will likely be phased out eventually anyway. Why waste money and harm animals at the same time?

I would also like to respond to a common argument made against the banning of caged layer hens. This argument is often posed at the idea of abolishing all types of factory farming. It is said that consumers will have to pay more for eggs and other animal products. This proposition envisages a false situation in which consumers are under the obligation to buy animal products. There is no human nutritional need for any animal product, and as such, consumers without the financial means to buy free-range animal products can simply purchase plant-based products instead. Rice, potatoes, legumes, oats and pasta are some of the cheapest and most readily-accessible foodstuffs.

Thank-you for considering my submission.

Regards

Claire McRae

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905
1378

From: Glenn Boyle s 9(2)(a)
Sent: Thursday, 19 May 2016 5:00 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

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

To say I'm underwhelmed by these proposed regulations is putting it mildly. Regulation of an activity is appropriate where the activity has significant benefits and the purpose of the regulation is to minimise or eliminate any associated external costs. Some activities, however, are simply beyond the pale, in the sense that the costs are simply too great to be mitigated by any regulation. In such cases, banning is the only answer. Factory farming is one such activity. The proposals relating to sow crates and hen cages are of the Clayton's variety, designed to give the illusion of doing something when nothing is actually being done at all. Clearly, they will not do.

The only acceptable course of action is to order an immediate review on how factory farming practices can be eliminated from the NZ landscape as quickly as possible.

Best wishes,
Glenn Boyle

s 9(2)(a)

"Curiosity never killed anything, except a few hours of time"

s 9(2)(a)

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Please refer to § 9(2)(a) for more information.

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✓ ~~#904~~

From: Kate Butler s 9(2)(a)
Sent: Thursday, 19 May 2016 4:59 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations
Attachments: APDTNZ Animal Welfare Regulations submission.pdf

1379

Hi there

Please find attached a submission on the proposed Animal Welfare Regulations from the Association of Pet Dog Trainers New Zealand

Regards
Kate Butler
Secretary, APDTNZ

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Association of Pet Dog Trainers New Zealand

Submission on Proposed Animal Welfare Regulations, May 2016

The Association of Pet Dog Trainers New Zealand is committed to the promotion of humane, dog-friendly training techniques to improve the relationships between New Zealanders and their dogs. We are overall very pleased with the proposed Animal Welfare Regulations and wish to make to make a submission on a few of the issues raised in the consultation document.

GENERAL QUESTIONS

The Association supports the introduction of Animal Welfare Regulations to make the matters covered by the minimum standards directly enforceable. We are satisfied that the minimum standards which are suitable for regulating have been addressed.

In response to Question 4, however, there are some matters related to dog training and welfare that we wish to be considered in future reviews of the legislation:

- The use of electric shock collars in training. These are not humane and are liable to both accidental misuse (usually due to poor timing of the trainer) and intentional abuse. They can in many cases actually worsen the dog's behaviour due to the effect of classical conditioning.
- The conditions in which puppies are raised prior to going to their new homes. There are many things which breeders can do which reduce the likelihood that dogs will develop training and behaviour problems in their new homes – for example, providing suitable opportunities for socialisation, and raising the pups in an environment which is conducive to partial toilet training while the pup is still with its dam. Behaviour problems are a major reason why dogs are rehomed, surrendered to shelters, and ultimately euthanised, as well as a huge source of frustration to dog owners. It is not fair to dogs or their owners that some breeders raise puppies without adequate stimulation and handling before they sell them to unsuspecting buyers.

PINCH OR PRONG COLLARS (PROPOSED REGULATION 4)

The Association recommends that only humane, dog-training training techniques should be used, and the use of pinch or prong collars violates the Association's Code of Ethics. We are pleased to see a proposed regulation for this issue as it has been somewhat of a grey area in the past, and we are aware that there are trainers and pet owners using these devices in breach of the minimum standard.

The proposed regulation would not have any effect on our members' practice, as our Code of Ethics already states that our members must not use pinch or prong collars. Some other dog trainers who do still use these tools will be affected, but as their use contradicts the existing minimum standard we consider that the regulation is justified. We do not believe that the use of pinch or prong collars is ever necessary, and would not support any exemptions to this regulation being made for police or military dog trainers.

We believe that the sale or supply of these collars should also be prohibited. We support the suggestion to include pinch and prong collars as prohibited devices under existing regulation. We also feel that professionals (such as dog trainers or veterinarians) who recommend the use of these devices to their clients should face higher penalties than the \$300 infringement offence, regardless of whether they supplied the collar or not.

We believe that the proposed definition will be sufficient to differentiate pinch and prong collars from other collars which are used in training.

DEBARKING

Most nuisance dog barking is caused by lonely, understimulated dogs who have nothing else to do all day. The Association supports a ban on debarking except as a last resort, as we believe that training and improvements to the dog's management are more humane and effective ways to reduce barking. This regulation will have little effect on our members' practice because they would typically recommend increasing the dog's daily exercise regime and providing enrichment toys to keep it occupied as a more effective solution to resolve barking.

We are not sure that the term "best interests of the animal" will adequately convey that debarking should only be performed as a last resort before euthanasia. It may be necessary to establish a more detailed definition that explains that debarking should only be performed after all attempts at training and managing the dog's barking have failed.

TAIL DOCKING (PROPOSED REGULATION 62)

The Association supports a regulation against the ban of any non-therapeutic tail docking. As noted in the consultation document, tails have a function beyond mere aesthetics and we believe that they all dogs should be allowed to keep their tails except where injury or disease make this impossible.

We are aware that this regulation will affect the practice of some breeders who still carry out routine tail docking on their litters. However, we consider that it is a step forward for animal welfare in New Zealand and look forward to joining the list of countries where this procedure has been prohibited.

We are concerned that the term "performed for therapeutic reasons" may not be clear enough to members of the public. Although "therapeutic" has a clearly defined meaning in medical/veterinary jargon, it can also be interpreted in a more general sense as anything that is beneficial to the dog's welfare. This may lead to a continuation of the practice of docking tails as a preventative measure against tail injuries. We prefer the wording from the existing recommended best practice of "required for treatment of an existing injury or disease".

We also believe that the regulation must be very clear that all forms of tail docking, including banding, will be prohibited, as some people do not understand the term "tail docking" to include non-surgical procedures such as banding.

From: cara-lee adams s 9(2)(a)
Sent: Thursday, 19 May 2016 4:58 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

905

1380

I would like say I do not support the banning the use of prong collars on dogs.

The use of a prong collar on high drive working breeds such as Malinois ,Shepherds Rottweiler etc is a useful tool not used or intended to cause harm to the dogs. I have been involved in both nzkc obedience clubs and clubs training in IPO. Most of the dogs I saw in kennel club obedience including my own looked like they were under duress being marched around the training grounds getting jerked by choke chains and flat collars. After about 7 months of this I found out about an IPO group and went along to have a look. I was very impressed with these happy willing dogs with beautiful obedience on and off lead control under distraction. These dogs were excited to work. I must say I was a little shocked at 1st to see a prong collar being used as they do look scary but I kept a open mind and saw these dogs were not stressed hurt or abused , but happy willing members of a handler dog team. Many of the dogs in training have been in breeding programs used by police , and military

I would not suggest that these collars are the right tool for you average family pet but they certainly have their place. As far as I am aware there have been no reported cases relating to dogs being abused due to the use of prong collars in NZ.

I would suggest allowing police military and other organisations training these Working breeds to be allowed to use prong collars in their training programs and not bow to the whims of uneducated misinformed persons who make decisions based entirely on the fact these collars "look" scary.

Cara Adams

s 9(2)(a)

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Out of Scope

906

From: s 9(2)(a)
Sent: Thursday, 19 May 2016 4:57 p.m.
To: Animal Welfare Submissions
Cc: Ministerials
Subject: FW: Proposals for changes to the Animal Welfare Regulationa

1381

From: s 9(2)(a)
Sent: Thursday, 19 May 2016 4:57 p.m.
To: 'NZGTA@outlook.com'
Subject: RE: Proposals for changes to the Animal Welfare Regulationa

Dear Eugenie Clapham

On behalf of Hon Nathan Guy, Minister for Primary Industries, thank you for your email regarding the NZGTA's 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

s 9(2)(a) | 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

From: Eugenie Clapham [mailto:NZGTA@outlook.com]
Sent: Thursday, 19 May 2016 3:47 p.m.
To: nathan.guy@national.org.nz
Subject: Proposals for changes to the Animal Welfare Regulationa

Dear Nathan,

Proposals for changes to the Animal Welfare Regulations

Personal details
This submission is from
The Executive,
NZGTA
C/O The Secretary

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

Submission

We are an elected executive representing 29 Clubs throughout NZ. Field

Trialling for gundogs has been around in NZ for over 75 years and has a membership in excess of 300.

Our aims as an organisation is to promote, foster and regulate the conduct of gundog trials throughout NZ to promote the holding of gundog trials and to make rules and regulations for these trials.

As an executive, we have consulted our membership widely on the proposed changes.

We support the New Zealand Council of Docked Breeds and the New Zealand Kennel Club in their Submissions.

We request that humane 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.

The reasons for this are as follows;

- Our membership consists of a large number of members that own, trial, and hunt with breeds that have traditionally had their tails docked to avoid injury. Working gundogs with long whippy tails and 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 and were bred to do. The only resolution for an adult dog suffering from chronic tail damage is a painful and traumatic amputation. 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.
- It has been shown in other countries where banding of tails has been banned, dog ownership of traditionally shortened tail breeds has dropped considerably (NSW by 73% Sweden by 51%) We believe this could have a detrimental effect on the membership in our clubs.
- Gundog trialling is an active, healthy, outdoor, physical sport which should be encouraged in the light of global obesity, and diabetes health problems. A loss of any of members to this activity would obviously have an impact on their health, later in life.
- Many of our traditionally tail shortened gundog breeds have reasonably small populations in NZ and any discouragement to own these breeds will result in even smaller gene pools with a subsequent decrease in health in these breeds.

For the welfare of working gundogs in NZ, I ask that you consider these practices to be allowed to continue. If there is any consideration being given to stop these practices, we request that as an organisation representing those most affected, we be personally informed and be given the opportunity provide further information and rationale on this matter.

Thank you for taking the time to read this submission.

The Executive Committee
NZGTA

Eugenie Clapham
National Secretary
NZGTA

s 9(2)(a) [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

e: NZGTA@outlook.com

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From: Melissa Shannon s 9(2)(a)
Sent: Thursday, 19 May 2016 4:56 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Submissions

907
1382

Attendee of the MPI Animal Welfare Regulations Proposal meeting 02/05/2016 Auckland.

The points I will be covering are:

1. Puppy Farming
2. Battery Farming
3. Factory Farmed Pigs (Farrowing Crates)
4. MPI'S Mandatory Inspections
5. SPCA'S Work & Limited Funding

Companion animals (dogs) no current proposals relating.

My proposal for dog breeders, owners, and puppy farming are;

1. A dog register so every dog or puppy that is born; whether it has survived or deceased is listed on this register, in order to protect them from harmful owners and acts such as puppy farms and the evolving NZ dog meat trade.
2. A ban on eating both dogs and cats within NZ privately and publicly (a ban from serving these animals in any kind of hospitality business). The eating of cats and dogs is normal in places like China and as NZ is allowing Chinese immigrants and investors into our property market/farms this is an extremely fundamental proposal at this point and time.
3. Regular six monthly inspections from either the SPCA or a private body employed under the Government to carry out a routine check with the minimum standards being mandatory to continue trading as a breeder.
3. Every dog sold online must be micro-chipped, the microchip number must be entered before the advertisement can be listed.
4. If the dog is listed before they are 3 months old its mother's microchip number must be entered before the ad can be listed.
5. Only one litter of puppies can be listed under each breeding dog's microchip number every second year, with a total of three litters for each dog.
6. The breeding dog must be between the ages of two and six.
7. A full trading history showing all animals bought and sold as well as feedback from buyers should be visible for every trader.
8. Buyers must be shown vet paperwork and the breeding facilities before buying their puppy. This will be enforced by the buyer who has the right to refuse to complete the contract for sale until the seller has complied with the rules.

Points 3-8 are backed up points from Paw Justice <http://www.donttrademe.co.nz/>

(17) Layer Hens- Opportunity to express normal behaviors in housing systems page 38
My proposal for battery/colony caged farming are;

They are cages that are bigger than a battery cage and 'furnished' with perches and laying and scratching areas. The problem is that they may be bigger but they have more chickens in them so the space each chicken gets is still very limited.

The Greens' position on colony cages is that they may be an improvement on battery cages but that is not enough of an improvement. They still do not give chickens enough room to display their natural behaviour and the perches and nesting and litter areas are so basic that they do not meet the needs of the chickens. If the industry is going to be investing in new systems to improve animal welfare, we believe that they should invest in something that actually provides a decent standard of living that allows chickens to express natural behaviours. We believe that barn systems should be the legal minimum. We've made a poster that compares the different egg production systems for how much space they give each chicken.

- See more at: <https://home.greens.org.nz/misc-documents/what-are-colony-cages#sthash.yD1dxgbQ.dpuf>

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We've made a poster that compares the different egg production systems for how much space they give each chicken.

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I am in agreement with Safe and the Greens party in that; colony cages may be an improvement on battery cages but its still not enough of an improvement. Barn systems should be the legal minimum; any animal that is raised in a cage is having its freedom and quality of life extremely compromised and exploited. I don't think it makes sense that if the battery egg industries are having to transition into colony cages; why wouldnt you expect them to just transition to barn farmed eggs and save further suffering. <http://safe.org.nz/colony-cage-cruelty-exposed>



Colony Cage Cruelty Exposed - SAFE

safe.org.nz

New investigation exposes the shocking truth behind 'improved' colony cages. A new colony cage farm that supplies eggs to major supermarkets has been exposed in an ...

1. Full ban of battery and colony caged farming with barn systems becoming the legal minimum. A phase out by 2022 is far too long and should be brought forward.
2. Six monthly inspections of all egg and chicken meat industries to check the routine running of them is complying with MPI'S animal welfare standards.

(27) Pigs- Size Of Farrowing Crates page 45

My proposal in-keeping with the views of SAFE are that farrowing crates should be completely banned, I believe this is the only humane way of progressing in terms of animal welfare standards but also as people are becoming more concerned and aware of where their food is coming from. Even implementing the regulations in this proposal are still condoning a very small space for the sow to live; allowing the horror of pig crate cruelty to continue.

1. Ban factory farming pigs in any kind of crate.

2. Six monthly inspections of any pig farms to ensure farmers are complying with animal welfare regulations.

4. Proposing that MPI have mandatory inspections put into place; being a minimum of six monthly to inspect the animal welfare of any registered farms in New Zealand; including dairy & meat and also for companion animals being bred on puppy and cat farms. Companion animals of anyone who has previously been reported for animal neglect or abuse. This could also be implemented on a voluntary basis by animal lovers who are checked under MPI or the SPCA and given guidelines to follow. I feel that just working off a 'response basis' as is currently done for companion animals by the SPCA (on their very small budget), is not active enough and allowing people to abuse and exploit animals for their own gain; such as the puppy farming industry. The state that some of these dogs have been seen and reported in; such as the two incidents that were in the media last year should never have been allowed to get this bad. If regular inspections and records were kept of every New Zealand farm and animal breeder it would make it less likely for them to be anonymous and cause such injustices to animals.

5. I propose that the SPCA is given significantly more funding towards the vital work they carry out in our country. I feel that they don't get the appreciation they deserve and nor can they keep up with the continually growing demand of animal abuse cases around the country; along with sheltering animals in local SPCA'S. In order to keep up with current their standard of work and ongoing cases I know they would greatly benefit from more generous government funding.

I am very glad that this proposal of animal welfare regulations is being implemented, there are some short falls in the document however I know you are trying to improve animal welfare standards and do believe this is a good start. The animal welfare meeting in Auckland was run well by Julie Collins and her team; and I think most of us would agree it was a worth while meeting to attend; given that we care about the future of New Zealand's animal welfare.

Kind Regards,
Melissa Shannon

908

From: Martyn Slade s 9(2)(a)
Sent: Thursday, 19 May 2016 4:52 p.m.
To: Animal Welfare Submissions
Cc: Martyn Slade
Subject: Submission on Animal Welfare Slades
Attachments: Slade submission on Animal Welfare Reg proposals.docx

Follow Up Flag: Follow up
Flag Status: Flagged

1383

To whom it may concern

Please see the attached submission for the proposed animal welfare regulations.

Please let me know if you have any problems opening the attached document.

Kind regards

Lisa

Lisa, Martyn & Cassidy Slade

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



To the Ministry for Primary Industries

Animal Welfare proposed regulations
Feedback submission form

Lisa D. Slade
Martyn L. Slade
Cassidy R. Slade

s 9(2)(a)

We are Lisa, Martyn and Cassidy Slade and as pedigree dog breeders have a combined professional interest for some 90 years. We have bred many champions in New Zealand and have a very well recognised name in many countries around the world for our chosen breed of dog. We have exported both show, companion, and working dogs into homes around the world and Martyn is a Dobermann specialist judge in which he has judged this breed as a representative of New Zealand in all states of Australia, Philippines, Japan, Indonesia, USA and has recently been invited to Judge this year in Argentina and next year in Brazil.

Martyn is a past president of the Dominion Dobermann Club and is a life member of the same. Martyn is the Chair and Lisa is the media/communications representative of the NZCDB

This submission from the above parties opposes the proposed changes to the docking of dog's tails and removing dew claws.

- 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.

We are accredited members of the New Zealand Council of Docked Breeds (NZCDB) and have had our animal husbandry skills signed off by a veterinarian, who must complete our 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).

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

We are 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 and we only perform the tail banding procedure under the Animal Welfare Act (No2) 2015 and this is not a surgical procedure.

The breed that we are associated with and that are banded by us are traditionally docked dogs that still perform their duties that they were designed for.

We 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 we are surprised that this proposal has taken shape.

We understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which we see as being extremely one sided and is not factual. We 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.

We 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.

We 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. We 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.

We 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.

We are 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-member's. neonate puppies; however in the last 4 years we 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.

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

When performing a dew claw removal, we 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, we are 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.

We 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. We 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.

We 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.

We understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which we see as being extremely one sided and is not factual. We 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 our profession as a Groomer and Boarding Kennel facility we 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.

We 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.

We 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 we 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.

As dedicated professional breeders of longevity, we have imported in excess of 20 dogs by the way of frozen semen which is stored in registered facilities in New Zealand and is used by us for our ongoing breeding programme. Each breeding that is stored has a significant value attached to it and 90% of the resulting puppies from these litter are destined to travel overseas into their respective homes. We will be severely financially impacted if any changes take place to dis allow tail banding and dew claw removal.

Our chosen breed, is a working dog that is bred for their guarding and protection aspects. The Dobermann is a manmade dog who was specifically bred as a tail shortened breed so that the tail is not an object that can be held onto or damaged when working. We have many of our dogs working in different "jobs" and one in particular works for the SPCA as therapy dog for the Out Reach Programme. This is the second Dobermann of ours to have this position. We have other dogs who have been members of search and rescue and all of our dogs are family members who are there to protect their family. Of recent note, one of our 4 month old puppies who lives in Cambridge, successfully alerted the family to a burglar and the Police apprehended the person straight away.

We are of the understanding that there can be public misunderstanding on the procedure of tail shortening and dew claw removal, and we would consider that this is not helped by the portrayal of the well-meaning rescue agencies displaying incorrect information and somewhat scaremongering propaganda. We find this an interesting concept considering they do not actively police their legal ability to engage with the offenders yet are willing to incorrectly inform the general public.

We believe the numbers speak for themselves. When you have an audited, regulated and fully informed team of professional members who understand the wellbeing and care of their dogs and puppies, who have completed in excess of 10,500 tail banding procedures without any complaints, then you would have to agree, there certainly isn't a problem with the current process. We are definitely not advocating that anyone can do this, there is a well-rounded process on getting an exemption to become a member group of the ABS, NAWAC and the NZKC has put all of the checks in place, which our membership adhere too. If this was a business, the CEO would certainly be extremely proud of the statistics since 2004. MPI perhaps should put themselves in the shoes of the CEO and support the results for the NZCDB. Dew claws can easily fit into this regime and we are only too happy to adopt the scheme for our members to perform. Remembering that our members all needed to have their Vet sign them off in the first place to become a bander so you would have to question is it the NZVA that has put a doctorial process in place for their members who were absolutely ok to A) perform this process of tail shortening and B) when they weren't able because their governing body told them not to unless under certain circumstances; sign off on their client to perform tail shortening by way of banding, because they understand the need, and they understanding their clients abilities and husbandry skills.

As members and executive of the NZCDB, we fully support the submission that this group has forwarded to you and believe there is a definite outcome that is favourable to both the accredited banders and breeders who remove dew claws and MPI who are seeking change. We believe we are the best group of people to be able to give you a complete sound view without mixing incorrect and uninformed information.

Thank you for the opportunity to comment.

Kind regards

Lisa, Martyn and Cassidy Slade
Martyn Dobermanns

Out of Scope

From: hse § 9(2)(a)
Sent: Thursday, 19 May 2016 5:06 p.m.
To: Animal Welfare Submissions
Cc: Rt. Hon. John Key; nathan.guy@national.org.nz
Subject: Submission on the Animal Welfare Act Review
Attachments: MPI Submission 190516.doc

As attached.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From:
Miss T Blankley

s 9(2)(a)

Send to:
animal.welfaresubmissions@mpi.govt.nz

and
Your MP
john.key@parliament.govt.nz

and
nathan.guy@national.org.nz

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

19 May 2016

Submission on the Animal Welfare Act Review
PLEASE WITHOLD MY Name and Address details.

Dear Sir/Madam

First of all, I am appalled at the lack of advertising and notification for this review. The Auckland Meeting advertisement in the NZ Herald on Friday 29 April 2016 stated that the meeting was on Thursday 28 April 2016. In fact, the meeting was on Monday 2 May 2016. It seems you are trying to sneak through major changes without justification.

As an owner of a gundog breed; I would like to put forward my submission on the following.

Item 3. All Animals Twisting on Animals Tail

Question for MPI :-

What about a kid twisting a tail? Dog/Cat as I've seen on numerous occasions. Are you going to issue a child or parent with an infringement? Tail twisting is a common sense practice, no experience with cattle so no comment.

Item 9. Dogs – Secured on moving Vehicles

The state seems more ideal than the proposed?

Current: "secured or enclosed in a crate".

Proposed: "must be secured in a way that prevent them from falling off".

13. Goats – Tethering Requirements

The current state seem better worded than proposed. I cannot really see difference in either wording?

57. Companion Animals – Desexing

Agree with proposal with additional wording. Veterinary nurses who have experience or are under supervision by a Vet should be included.

Item 61. Dogs – Dew claw removal

I request that this continues to be allowed in NZ as is the current approved practice. By accredited practitioners.

REMOVE “must only be performed for Therapeutic reasons.

Current State is sufficient.

This procedure is currently performed on working dogs to PREVENT INJURY. A dew claw ripped off in an adult dog would CAUSE pain and distress.

QUESTION: If this proposal is passed and when a dogs dew claw is ripped off causing pain and distress, can the owner prosecute MPI for causing unnecessary pain and distress? And pay the Vet Bill?

Performed correctly there is no bone cut though, there is no bleeding. Breeders are scrupulously conscious of sterile conditions so there is very limited chance of infection.

Dew claw 's not removed and damaged or ripped as an adult cause excruciating pain and would require major surgery to remove. I view their removal as a new born a preventative for the future well being of the pup. The same as I view Tail Docking and vaccinations.

Item 62. Dogs - Tail docking

I request that this continues to be allowed in NZ as is the current approved practice. By accredited practitioners.

REMOVE “must only be performed for Therapeutic reasons.

Current State is sufficient.

This procedure is currently performed on working dogs to PREVENT INJURY. A tail damaged in a working situation may mean hours away from a vet or on the weekend, which would CAUSE pain and distress, not to mention financial hardship from paying the Vet Bill.

QUESTION: If this proposal is passed and when a dogs tail is damage causing pain and distress, can the owner prosecute MPI for causing unnecessary pain and distress? And pay the Vet Bill?

QUESTION: Who keeps putting this on the Agenda. You have tried and failed 3 or 4 times in the last few years and reasons for docking have not changed. Do you think our forefathers were idiots? Docked Breeds are docked to PREVENT INJURY. Countries that have introduced this law are now looking at repealing due to the amount of injuries occurring. One of the previous times you tried to introduce banning tail docking the SPCA campaign was full of propaganda with their Main Pin Up Poster of an adult dog with it's tail hacked off. That was not tail docking, that was abuse. But the idiots who have no knowledge of the breed or breed history thought that was what was happening and signed the SPCA's bs petition. If you do not own a docked breed, have no practical knowledge of the breed or the breed's history of why they are docked then all those submissions should be put in the rubbish bin.

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

Gundog breeds with long whippy tails historically docked would commonly injure their tails while hunting through vegetation and thick scrub or today in everyday life pursuits. Their fast tail action often leads to splitting or tearing and bleeding which is painful and extremely difficult to treat. Because of the long thin tail, the end has very poor circulation which makes healing difficult and prone to infection.

All Tails are not created equal. The GSP's tail like many of the Versatile Gundog breeds, which is a man made breed which didn't get the tail right. Unlike the Labradors who have a thick well covered tail. So historically the fore fathers of the breeds where aware of this weakness and docked accordingly for the well being of their dogs. Undocked they would be very prone to damage in the dogs environment be this rural or urban. The only resolution for an undocked adult Versatile dog suffering from chronic tail damage is a painful and traumatic amputation which as an adult is major surgery to remove.

Undocked, the interaction of the tail conformation, breed activity and the environment causes increased risk of injury through the life of these breeds.

The Shortening of the weak portion of the tail humanely at a few days old eliminates the risk of injury. By shortening but still retaining a substantial tail occurs once and protects against chronic pain and discomfort for life, typically 12 to 15 years.

The NZVA research study that found little evidence of tail damage in dogs in New Zealand is totally flawed. Because the dogs prone to tail damage are to date docked as newborns. They also failed to acknowledge that there are in excess of 170 countries in the world that DO NOT have a ban on the docking/shortening of dogs tails, and there are countries which have had the ban now looking at reversing that decision ie Scotland.

I view Tail removal in a new born in the Gundog breeds historically docked, as a preventative measure for the future health and well being of the pup. The same as I view Dew claw removal and vaccinations for the dog's future well being. So for the welfare of working gundog's breeds in NZ, I ask that you consider this practice to continue to be allowed.

Item – SPCA

You are proposing that the SPCA is given more powers and will be responsible for the fines you are proposing. The SPCA are a corrupt and unfit charity to carry out the responsibilities you are proposing. I was appalled that the SPCA Executives are paid bonuses in the way of Kitchens and First Class Round the World Airfares – I certainly don't believe people donate their hard earned money to pay for someone's extravagences. Please see Attachment 1 which highlights issues that are occurring overseas with the format you are proposing.

Thank you for taking the time to read this submission.

Yours sincerely

Trisha Blankley

Attachment 1.

RSPCA at risk of losing royal title.

<http://www.shootinguk.co.uk/news/rspca-at-risk-of-losing-royal-support-52321>

RSPCA losing credibility with British conservative MP's after board member compares farming animals to the Holocaust.

<http://www.shootinguk.co.uk/news/rspca-may-lose-credibility-after-activists-join-council-45334>

Wooler report shows lack of accountability or transparency in RSPCA, damage to credibility from prosecutions: Public donations dropped by 7 million pounds last year.

<http://www.shootinguk.co.uk/news/wooler-report-tells-rspca-stop-prosecuting-protect-reputation-40693>

Explanation of Wooler Report & judicial criticism:

This latest case of judicial criticism of the RSPCA comes at a time when the charity's policies on bringing prosecutions are being reviewed by former HM chief inspector of the Crown Prosecution Service Stephen Wooler. Mr Wooler's appointment was prompted by the Attorney General late last year following a number of cases in which the RSPCA's practices had been criticised.

Read more at <http://www.shootinguk.co.uk/news/rspca-criticised-by-judge-for-overstepping-the-mark-165#RS1z1UlxG5oHxbFw.99>

Charity Commission investigating "bullying tactics" and intimidation of farmers:

<http://www.shootinguk.co.uk/news/rspca-still-under-investigation-653>

District Judge criticises RSPCA. Cross party of MP's claims charity has "failed in their duty of prudence".

The meeting with the Charity Commission was set after a cross-party group of politicians, including Lord Heseltine, Kate Hoey MP and Simon Hart MP, former chairman and chief executive respectively of the Countryside Alliance, accused RSPCA trustees of failing in their "duty of prudence" to the organisation and its funds. They called on the Charity Commission to investigate.

Read more at <http://www.shootinguk.co.uk/news/charity-commission-calls-in-rspca-1596#qpxtKZf4XXGsJgRt.99>

There's also criticism that UK Police have admitted they have been secretly sharing private and personal records (such as criminal records and vehicle traces), with these bully's despite the RSPCA having no legal authority to request such data.

<http://www.shootinguk.co.uk/news/rspca-access-to-police-records-revealed-869>

RSPCA criticised for relentlessly persecuting individuals on no-cost-spared basis:

The RSPCA was stung by the media and public reaction to its £327,000 prosecution of a hunt in Prime Minister David Cameron's constituency last December. Opinion polls showed the charity's reputation was seriously dented by evidence of politicisation and profligacy with public donations (News, 30 January).

The RSPCA is probably the second biggest criminal prosecutor in the country, bringing thousands of cases every year. It is worrying to think how often the RSPCA's tactics might work to produce a miscarriage of justice.

Read more at <http://www.shootinguk.co.uk/features/why-the-rspca-charges-into-court-987#ofXcwr7Fg8p7FAOX.99>

Read more at <http://www.shootinguk.co.uk/features/why-the-rspca-charges-into-court-987#ofXcwr7Fg8p7FAOX.99>

Out of Scope

910
1385

From: Robert Docherty s 9(2)(a)
Sent: Thursday, 19 May 2016 6:41 p.m.
To: Animal Welfare Submissions
Cc: nathan.guy@national.org.nz
Subject: Submission on Animal Welfare Act Review
Attachments: MPI Submission d18may2016.doc

Hello,
Pl find my submission attached.

Rob Docherty.

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

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Send to:
animal.welfaresubmissions@mpi.govt.nz

and

nathan.guy@national.org.nz

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

18th May 2016

Submission on the Animal Welfare Act Review

Dear Sir/Madam,

I am an Auckland & Regions German Shorthaired Pointer Club member and owner of a gundog breed and have been for about 20 years; I would like to put forward my submission on the following.

Item 61. Dogs - Dew claw removal I request that this continues to be allowed in NZ as is the current approved practice. By accredited practitioners.

Performed correctly there is no bone cut though, there is no bleeding. Breeders are scrupulously conscious of sterile conditions so there is very limited chance of infection.

Dew claw 's not removed and damaged or ripped as an adult cause excruciating pain and would require major surgery to remove. I view their removal as a new born a preventative for the future well being of the pup. The same as I view Tail Docking and vaccinations.

Item 62. Dogs - Tail docking I request that this continues to be allowed in NZ as is the current approved practice. By accredited practitioners.

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

Gundog breeds with long whippy tails historically docked would commonly injure their tails while hunting through vegetation and thick scrub or today in everyday life pursuits. Their fast tail action often leads to splitting or tearing and bleeding which is painful and extremely difficult to treat. Because of the long thin tail, the end has very poor circulation which makes healing difficult and prone to infection.

All Tails are not created equal. The GSP's tail like many of the Versatile Gundog breeds, is very thin. The GSP is a man made breed which didn't get the tail right. Unlike the Labradors who have a thick well covered tail. So historically the fore fathers of the breeds were aware of this weakness and docked accordingly for the well being of their dogs. Undocked they would be very prone to damage in the dogs environment be this rural or

urban. The only resolution for an undocked adult Versatile dog suffering from chronic tail damage is a painful and traumatic amputation which as an adult is major surgery to remove.

Undocked, the interaction of the tail conformation, breed activity and the environment causes increased risk of injury through the life of these breeds.

The Shortening of the weak portion of the tail humanely at a few days old eliminates the risk of injury. By shortening but still retaining a substantial tail occurs once and protects against chronic pain and discomfort for life, typically 12 to 15 years.

The NZVA research study that found little evidence of tail damage in dogs in New Zealand is totally flawed. Because the dogs prone to tail damage are to date docked as newborns. They also failed to acknowledge that there are in excess of 170 countries in the world that DO NOT have a ban on the docking/shortening of dogs tails, and there are countries which have had the ban now looking at reversing that decision ie Scotland.

I view Tail removal in a new born in the Gundog breeds historically docked, as a preventative measure for the future health and well being of the pup. The same as I view Dew claw removal and vaccinations for the dog's future well being. So for the welfare of working gundog's breeds in NZ, I request that you consider this practice to continue to be allowed.

Thank you for taking the time to read this submission.

Yours sincerely

Robert Docherty

Out of Scope

#911
1386

From: Johnno § 9(2)(a)
Sent: [REDACTED]
To: Animal Welfare Submissions
Subject: Submission for tail banding
Attachments: MPI Submission 2016.docx

Dear Sir/Madam

Please find attached my submission in favour of tail docking.

Kind regards

Johnathan Smith

This email has been checked for viruses by Avast antivirus software.
<https://www.avast.com/antivirus>

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Johnathan Smith

s 9(2)(a)

17th May 2016

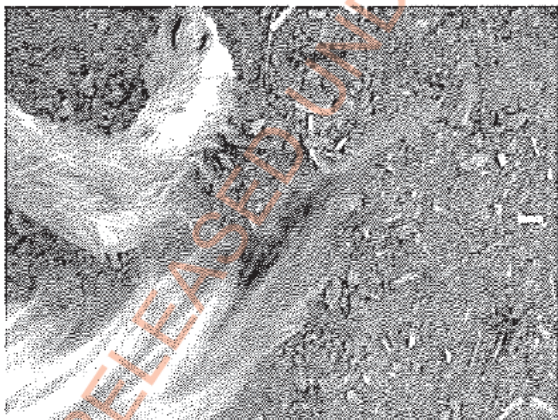
Submission on the Animal Welfare Act Review

Dear Sir/Madam

As a Committee member of both the Waikato Gundog Club and The Working Spaniel Club and as a hunter, triallist, owner and breeder of working English Springer Spaniels, I would like to put forward my submission.

I request that tail docking of working gundogs continues to be allowed in NZ. Working gundogs frequently injure their tails whilst hunting through heavy vegetation and thick blackberry, where their fast tail action can easily lead to torn and bleeding tails which are painful and extremely difficult to treat. This is repetitive injury that happens every time the dog is worked. It can lead to eventual amputation of the tail in the adult dog which is a major surgery resulting in considerable discomfort. Shortening the tail in very young pups eliminates the risk of injury and is considerably less painful and traumatic. The Accredited Banders Scheme is audited by the NZKC to ensure compliance with agreed protocols and Code of Animal Welfare.

Below are photos of long and injured tails, which occurred in my dogs. The first dog, an 8yo ESS owned by a club member, has several inches at the end of her tail without hair and a significant thickening of the dermal layer which bleeds within 5 minutes of working.



The second set of pictures show FCh Briarwood Bradie who was imported from the UK – these photos were taken after 10 minutes of hunting in a south island trial – as you can see the tail bleeds profusely and causes considerable discomfort.



As a breeder, we have bred six litters of working English Springer Spaniels over the last 15 years – the first four litters were all docked by my veterinarian and the last two litters in 2011 were banded by NZKC 'Accredited Persons' – none showed any complications from this procedure and all the resultant puppies have gone on to have full and active hunting careers with no evidence of tail damage when hunting.

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

If there is any consideration being given to stop docking of dogs in NZ, I request that I be personally informed and be given the opportunity provide further information and rationale on this matter.

Thank you for taking the time to read this submission.

Yours sincerely

Johnathan Smith

✓ #912
1387

From: Rebecca Wells s 9(2)(a)
Sent: Thursday, 19 May 2016 8:13 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.

Rebecca Wells

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Out of Scope

913

From: Georgia Olsen s 9(2)(a)
Sent: Thursday, 19 May 2016 8:19 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Submission

13888

To whom it may concern,

I completely support the Submission made by the organization SAFE, (Save Animals from Exploitation.)
Please consider this a submission in support of all their concerns.
Any questions please do contact me,

Yours sincerely
Georgia Olsen

Georgia Olsen
s 9(2)(a)

[Redacted signature block]

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Lesley s 9(2)(a)
Sent: Thursday, 19 May 2016 8:55 p.m.
To: Animal Welfare Submissions
Subject: Submission

To the Ministry of Primary Industries,

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

I would like you to uphold the Animal Welfare Act of NZ. For the first time in our country's history, tourism has overtaken agriculture as a source of revenue. It is time to stop pandering to the demands of farmers and the blatant disregard of this law.

Colony cages are only marginally less disgraceful than the original cages they replaced. if this Govt is serious about stopping smoking by 2025, it should be no harder to phase out ALL cage-based egg-producing systems.

Factory farming is a shameful and abhorrent practice, and incompatible with New Zealand's clean, green, pro-environmental, pro-welfare "image". An industry-wide review is needed.

Rodeos are cruel and inhumane, and the use of exotic (or any, for that matter) animals in circuses is an indictment on the image (mentioned above) via which we wish the world to view us.

Let us follow the laudable stances taken by Ringling Brothers and Sea World in banning exploitation of elephants and breeding of killer whales in captivity, respectively.

Lesley Munro, BVSc

s 9(2)(a)

✓ #915
1390

From: susan mill § 9(2)(a)
Sent: Thursday, 19 May 2016 9:06 p.m.
To: Animal Welfare Submissions
Subject: Dew claws
Attachments: National Dog Groomers Association of New Zealand.docx

Follow Up Flag: Follow up
Flag Status: Flagged

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Animal Welfare proposed regulation feedback submission form

Email to: animal.welfaresubmissions@mpi.govt.nz before 5PM 19 May 2016

National Dog Groomers Association of New Zealand

Sheila Morris

s 9(2)(a)

Email: s 9(2)(a)

Member contact details: Name, address, email phone number

s 9(2)(a)

The National Dog Groomers Association of New Zealand was founded in 1990 and our group now has a membership of 377 and growing.

This is an organization representing the standards, goals, aspirations and image of the Professional Pet Groomers. Our primary intention is aimed at uniting groomers through membership and in this way we hope to form a professional and sincere alliance that will benefit the grooming industry by recognizing the true and committed professional. NDGA provides advanced continuing educational programs designed to enhance the expertise and business acumen of professional pet groomers and provides one an opportunity to expand professional contacts, to make friends with individuals with common interest.

NDGA along with continuing education has formatted Master Groomer's program for those groomers wanting to bring their skills to Global industry standard. It involves a 4 year process featuring Gun Dog Group, Terriers Group, Non Sporting Group and a Final exam on Toy Group. The groomer must do a

workshop for each group, complete a timed practical exam and sit a written exam on each group to gain breed specific knowledge. The practical exam is graded by an examiner and not all pass. Along with the importance of skill NDGA advocates safe operating standards. Health and Safety and good Animal Welfare practices are at the top.

Feed Back on 61 Dogs Dew Claws The proposed regulations state Front Limb dew claw removal and articulated (jointed) hind limb dew claw removal:

Must be performed by a veterinarian or 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 claw: non articulated (greater than or equal to four days of age)

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

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

National Dog Groomers Association of New Zealand disagrees with this proposal in its entirety.

The dog grooming professional members groom an average of 6 to 10 dogs a day. The groomers are the first stop to finding problems relating to dew claws or many health issues. We see a variety of breeds and a very high percentage of mixed breed dogs. We see at least 7% of our monthly grooms with dew claw problems. We see curled around nails in bedded into the dogs flesh causing severe tissue damage. This has many times has been long term and considerably painful to the dog. There are 377 members and there are more groomers out there not members so the statistics are low.

Based on 10 dogs groomed a day by our members is 75,400 grooms per month at 7% gives us 5,278 dogs with dew claw issues. The grand total of 63,336 dogs

a year before a veterinarian even see's the dog. Most people do not like cutting their dogs nails and leave it until it is too late.

It is our understanding that MPI partly funds RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which we see as one sided and not factual. The NZKC has a large membership of 6000 members and our NDGA with a membership of 377 were not considered as a major stakeholder. Not to include the fact our members service **modestly 904,800** grooming dogs annually. Most times we are the first stop in identifying a problem with a dog.

Many of our members are acting under the documented quality assurance scheme that assures compliance with in the minimum standard. As far as we know there are no complaints about the existing accredited scheme.

When the qualified individuals perform the removal of dew claws the puppies are in the **NOENATE** puppy age 4 days of age or under. At this time, it is a well recognized 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 and does not bleed when performed correctly. This falls under the non articulated bone.

NDGA believes the breeder should have the choice to remove dew claws and should be done by an accredited scheme or veterinarian.

Photo's to be attached:

From: Candice Robbins-Goodman^{s 9(2)(a)}
Sent: Thursday, 19 May 2016 9:19 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 ban the chaining of domestic dogs by making exercise and time off the chain compulsory. There needs to be more monitoring on the welfare of domestic animals as chaining alone causes depression, other mental issues along with physical damage. As well as inadequate shelter and food and exercise.

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.

Many thanks

Candice

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From: Jason Pye § 9(2)(a)
Sent: Thursday, 19 May 2016 9:27 p.m.
To: Animal Welfare Submissions
Subject: Prong Collars

Submission on the proposed Animal Welfare Act -Dogs

My Name is Jason Pye & am a trainer with the Dogsport Nz group who featured on a recent Seven Sharp episode debating the use of prong collars. I have been training working line dogs for the past 14 years, in that time this passion of mine has taken me to different countries around the world including attending training seminars in Canada -USA -Australia & many here in New Zealand. In this same time I have seen the training of dogs improve hugely with better methods & access to more information through online videos. I have trained countless dogs for our club in that time & also dogs in Police -Corrections -Search & Rescue so I would like to think I have gained a fair amount of knowledge in that time.

Also there has been a huge push in the positive training of dogs & a lot of hysteria towards people who do not whole heartedly believe in their "ideology". I think in any application of dog training positive reinforcement is the best way to train a dog a new skill set. I am a big believer in this & this was something that I emphasized was a huge part of our clubs training philosophy while being filmed for the seven sharp episode which was not shown as I hoped it would be. What we showed with our prongs was demonstrative only..to show that the dogs have no negative reaction to the prong collar & prong collars are not the basis of our training.

What I have also learnt in dealing with the type of dogs we train which are genetically strong willed-courageous & motivated is that positive only training only gets you so far..positive only training does not extinguish unwanted behavior so that is where aversives come into play..by potentially banning the use of a prong collar you are taking away a very valuable "tool" in this process..& prong collars are just that.. a "tool" ..we cannot deny their appearance but their appearance is worse than their application. This particular tool is very valuable in helping your average pet person walk their strong untrained dog that we all see dragging their handlers around the streets everyday.. consequences are not abuse they are a way of communicating to your dog that particular behavior isn't wanted..prong collars do not define abuse. How can prong collars be related to dog abuse in this country when 95 percent of people before this debate had even started had never seen one in their life & are pushing for the banning of them on emotion alone..purely on looks without any education on the application of the prong..these are the same people who have the most mis-behaved dogs while our working dog colleges & myself who put countless hours into training our dogs are being judged & maybe penalised for their ignorance & lack of understanding. This whole push for positive only training is leading to more dogs ending up in shelters & euthanized because the owners power is being taken away & they believe they have no other option to fix their dogs issues as all they have been led to believe is positive only training fixes everything..so the dog becomes too strong & out of control & in the process a liability. It would be better off consulting actual working dog clubs like our own who would be happy to educate & help rather than listen to pet people who can barely get their dogs to sit in one spot for more than 10 seconds. It's very frustrating & backwards. We train & trial our dogs yet our information is deemed to be less important than those who do nothing apart from the odd walk with their dogs!! By banning the prong it will NOT stop dog abuse here in this country. When people have emotions & bad intent it does not matter the abuse will happen regardless via sticks. punching kicking..not feeding..continuous tethering. no water..& just as important NO LEADERSHIP!!!!

I hope I have got a few very important points across because the banning of prong collars is very flawed & is a witch hunt & you need to look for where the real abuse happens.

If you have any questions I can be contacted

Jason Pye

§ 9(2)(a)

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918
1393

From: Sean Foster s 9(2)(a)
Sent: Thursday, 19 May 2016 9:12 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations
Attachments: Submission on Animal Welfare Regulations.docx

Please find my submission attached.

Regards Sean Foster

Sent from Surface Pro

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To whom it may concern

Submission on Animal Welfare Regulations

This submission is in regard to the use of prong collar use on dogs.

I have been training dogs since 1990, firstly in general obedience and later in the sport of Schutzhund. For the last 13 years I have also been coaching new handlers and helpers. Over this time period I have both witnessed the use of prong collars and used these myself. To date I have never witnessed or heard of any misuse of this equipment and neither have I seen any evidence of injury to dogs through the use of prong collars.

Unfortunately, the prong collar does look rather primitive and as such I do not believe it is fair to ask the general, uninformed public regarding the use of prong collars. During the training of new handlers in the use of prong collars we always teach the use of the collar on the arm of the new handler. The effect of the prong collar is to squeeze the dog and thereby restrict the drives in the dog. The use of these collars is not required in sensitive or low energy dogs, they are only used on highly energetic or more insensitive, larger breeds. The effect of the collar is to achieve compliance with the minimum of stress. I have witnessed on numerous occasions handlers trying to restrain larger dogs without the use of the prong and inevitably the result is negative often with hard physical manipulation around the neck through the use of conventional "fur saver" neck chains/collars. These collars are freely available at any pet store, are used with no training input and are often used with such force that injury to the dog is possible. Prong collars are not only very humane but significantly reduce the chance of injury to the dog.

It is disappointing that the use of prong collars in New Zealand has become an issue, especially when there are no records of reported misuse of such collars. They are an extremely valuable tool for specific dogs, who would no doubt have to be managed with alternate equipment that is not only likely to be more traumatic to dogs, but to also pose a significant risk of injury to dogs that are boisterous in nature.

Regards

Sean Foster

§ 9(2)(a)

Telephone: § 9(2)(a)

Email: § 9(2)(a)

Maria Cassidy

From: Cambridge Equine Dental Services Ltd
Sent: Sunday, 8 May 2016 4:29 a.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations
Attachments: Submission on Animal Welfare Regulations.pdf

Dear Minister of primary industries,

Please find attached my submission on animal welfare regulations. I apologise for submitting this after the deadline for submissions and totally understand if it can no longer be utilised. I would however be thrilled if my thoughts could be of consideration to you in relation to equine dentistry from the perspective of an individual with a tertiary degree in equine dentistry. Please do not hesitate to contact me if you have any questions or if I could be of any assistance.

Yours Sincerely,

Annmarie Hughes

Annmarie R Hughes BSc (Hons)

Submission on Animal Welfare Regulations

In Relation to: Section 16 of the Act – Criteria to determine whether a procedure is a significant surgical procedure.

In relation to procedures of an equine dental nature, I believe that whether the practitioner is appropriately trained to carry out the procedure in questions is a more relevant consideration than the determination of whether the procedure is a significant surgical procedure or not. A system similar to that utilised by the British Equine Veterinary Association (BEVA) could be implemented very successfully in New Zealand. The BEVA classification system grades procedures in to three groups (See appendix A below).

- Category 1 procedures may be carried out by an individual after recognized training without specific attainment of qualifications.
- Category 2 procedures may be carried out by veterinarians and appropriately trained / qualified equine dental technicians.
- Category 3 procedures are restricted to veterinarians or vet students under veterinary supervision only.

10.2: Proposal 55 – Dental Work

In relation to equine dentistry; I fully support that motorised equipment should be specifically designed for the purpose of dentistry. I also acknowledge that if motorised equipment is used inappropriately that it may in some cases cause thermal damage to teeth, and that a cooling system installed in such equipment may reduce the risk of thermal damage. I do however believe that if motorised equipment is being utilised correctly by appropriately trained / qualified individuals or veterinarians, with in depth knowledge of equine dental anatomy and physiology then there is no reason why a practitioner should be practicing in a way that could risk inducing thermal trauma to teeth.

As mentioned above I believe, that if we could restrict the use of motorised equipment to appropriately trained professionals or veterinarians with sufficient knowledge and education in the field this should prevent or indeed significantly reduce the incidence of welfare issues in relation to equine dentistry.

To conclude; The classification of significant surgical procedures and enforcing the appropriate use of powertools in equine dentistry are of course very relevant

to the welfare of an animal but may be an example of 'running before we can walk'. I believe that if we were to take a step back and look at the bigger picture for equine dentistry in New Zealand that if we can strive to provide current continuing education in equine dentistry for veterinary surgeons as well as supporting / educating / producing suitably trained technicians the welfare of the horse will be suitably protected.

A suggestion for achieving this would be to run an examination accredited by the New Zealand Equine Veterinary Association (NZEVA) for vets and appropriately trained technicians. Who upon successfully passing a stringent theory and practical examination may safely practice equine dentistry with technicians being able to practice category 1 and 2 procedures and veterinarians practicing category 1, 2 and 3 procedures.

Appendix A:

BEVA Category 1 Procedures

Those procedures which an individual can perform after recognised training without specific attainment of qualifications.

- *Removal of sharp enamel points using manual rasps only;*
- *Removal of small dental overgrowths (maximum 4mm reductions) using manual rasps only;*
- *Rostral profiling of the first cheek teeth (maximum 4mm reductions), previously termed 'bit seat shaping';*

BEVA Category 2 Procedures

- *Examination of teeth;*
- *Removal of loose deciduous caps; and*
- *Removal of supragingival calculus.*
- *Examination, evaluation and recording of dental abnormalities;*
- *The removal of loose teeth or dental fragments with negligible periodontal attachments*
- *The removal of erupted, non-displaced wolf teeth in the upper or lower jaw under direct and continuous veterinary supervision;*
- *Palliative rasping of fractured and adjacent teeth; and*
- *The use of motorised dental instruments where these are used to reduce overgrowths and remove sharp enamel points only. Horses should be sedated unless it is deemed safe to undertake any proposed procedure without sedation, with full informed consent of the owner.*

BEVA Category 3 procedures

All other procedures and any new procedures, which arise as a result of scientific and technical development, would by default fall into category 3, which are those procedures restricted to qualified veterinary surgeons and are not proposed for deregulation. It is therefore NOT legal for these to be performed by non-veterinarians.

From: Ted & Val § 9(2)(a)
Sent: Saturday, 21 May 2016 7:08 p.m.
To: Animal Welfare Submissions
Subject: MPI Discussion Paper 2016/12

To Ministry Primary Industries
Wellington

I have been involved with pigs all my working life from school age to now in my sixties. My son also works in our piggery and has had experience on five other commercial units and supports my comments To this submission based on his own experience. He also has young children at the local school and is worried about the future of this Industry and its ability to provide a sustainable income for his family if More constant and unnecessary regulation is forthcoming .The satisfaction of working in the agriculture is seriously being eroded by truckloads of regulation trying to cover every eventuality and what appears To be a small army of bureaucrats running around trying to ping us. Who are these people who compile these rules and have they ever had personal experience on a real farm or do they form their opinions from TV ? We care hugely for our animals and treat them well otherwise they are not productive. We are subject to our own Pork Industry Codes of Welfare that are based on practical experience and science and are Worlds Best Practice! None of the vast amount of imported pig meat is subject to our required standards where it should be. Please transfer your efforts to rectifying this . NZ consumers have the right to know which standards apply to the pork they eat.

Proposal 1

Electric Prodders . Obviously written by someone who has never loaded serious numbers of pigs! A pig baulking further up the race can cause mayhem and make the rest clog up or turn around and climb Over the rest potentially resulting in damage to the operator and other animals .Far better to have a experienced (truck driver) person keeping the flow moving. Less stress for all . A fellow pig farmer in Taranaki is currently recovering from having both knees operated on because of the practice of pushing stubborn pigs with his knees. I also were starting to suffer from the same Condition until changing this practice .We need the aid of prodders used appropriately to prevent injury. It is not just a saying of the phrase "pig headed" It comes from the reality. We do agree they should not be used on sensitive areas .

Proposal 24

Dry sleeping areas. Pigs do not always choose to keep an available area dry . The Duroc breed for instance prefers a colder and often damp area to rest in . Also Ad-Lib feeding ,weather temperatures and Other factors contribute to the resting habits of pigs. Provision of an adequate area is enough without getting overly rule bound.

Proposal 25

Minimum space. Well covered in our Welfare codes .Pigs grow fast and are often shifted through at least three stages of housing. Factors such as feed levels,pig health,genotype,temperature and ventilation Issues as well as the time of year will impact. Imperfect regulation will only confuse these issues.

Proposal 26

Dry sow stalls. Already well covered by Industry codes .Copy them .They are very well researched. Look into regulating the imported meat that dosnt meet OUR standards!!!

Proposal 27

Farrow crates. Support and copy our current codes . they are intensively researched. Any farmers not quite there need time and money to upgrade . we do not roll around in money bins!

Proposal 28

Provision of nesting material . Where did this idea come from?? Stupid idea for indoor housing unless specifically set up for .Would mean a major work load increase ,more cost,more piglet mortality,
More compromise of piglet welfare due to huge bacterial increase along with blocked effluent drains and pumps. A totally impractical idea.

Stock Transport. Covered by our own codes. Just copy them!

Cheers Ted Gane



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921

Out of Scope

From: Rosie Julou ~ s 9(2)(a)
Sent: Thursday, 19 May 2016 5:34 p.m.
To: Animal Welfare Submissions; rotorua.mp@parliament.govt.nz;
nathan.guy@national.org.nz
Subject: The proposed amendment of the Animal Welfare Code by the Ministry of Primary Industries.
Attachments: Tail Banding submission (Rosemary Julou).pdf

Hi There,

Please see attached my submission in relation to the above.

Kind regards

Rosie

s 9(2)(a)

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animal.welfaresubmissions@mpi.govt.nz

rotorua.mp@parliament.govt.nz

nathan.guy@national.org.nz

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

19th May 2016

Submission on the Animal Welfare Act Review

Dear Sirs,

I am writing to express my concern in regards to the proposed changes to the Animal Welfare Act Review in relation to tail docking and dew claw removal.

My husband and I own and work a team of gundogs, and my husband has owned a variety of gundog breeds throughout his 23 years as a professional gamekeeper both in New Zealand and in the UK. We are proud to say our dogs are part of the family and work incredibly hard to allow us to do a fantastic job in the field, both as part of our job and recreationally. Our spaniels in particular have been bred to work energetically in cover and as part of that, use their tails profusely. However, they have been docked as puppies and therefore the damage is minimal.

I do not support the docking of tails for aesthetic purposes, to meet the 'look' or 'image' of a certain breed and certainly find the idea cruel and unnecessary. However working dogs are an entirely different matter and must be treated as such. I ask that you seriously consider how many of the vets and experts involved in this proposal to ban docking, actually own and work their own dogs in this country. It appears very obvious to me that there are multiple organisations in New Zealand associated directly with working dogs who MUST be consulted in regards to this proposal. Only then will you have both sides of the story. I would suggest that tail docking be allowed to continue by approved practitioners for actively working dogs from working breeds only.

Finally can I please remind you that these dogs are loved, respected and valued, they are loyal, tough, hard-working and bred to hunt which they do with a passion. As owners, we would never do anything to our dogs that is not in the absolute best interests of our animals.

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

Thank you for taking the time to read this submission.

Yours sincerely

Rosie Julou

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#922

From: Robyn Gaskin s 9(2)(a)
Sent: Thursday, 19 May 2016 6:08 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

1397

I wish to make a submission regarding the proposal to prohibit the use of pinch and prong collars

I am a 61 year old woman who has competed successfully with my Irish setters as working gundogs for over 40 years. I have the top winning pointing dogs (of all breeds) in NZ. I have used prong collars on my dogs for more than 30 years and they have NEVER caused them pain or distress. The reason I use prong collars is for my dogs' (and my) comfort and welfare at a gundog trial. Which is the only time I ever use them. In a wild game trial, a pointing dog hunts for pheasants and quail, competitively braced against another dog. I handle up to 4 dogs (who all individually walk perfectly on a loose lead) and we follow all day behind other dogs hunting for birds on rugged hill country, while awaiting our individual turn to compete. When not fitted with prong collars, the dogs exhaust and endanger themselves (and me) awaiting their turn, through excessive excitement and lunging on their leads. With a prong collar fitted loosely and no pressure applied, the dogs modify their own behaviour to walk quietly and calmly behind other competing/hunting dogs, often in terrain which is difficult and dangerous to negotiate. When it is my turn to compete with one dog I have to leave 3 behind with 'volunteer' lead holders. Without a prong collar my highly trained, powerful dogs will pull, jerk, lunge, whine, bark, and no amount of coercion will calm them down. They simply want to be with me, and they want to be hunting.

The prong collar is self-regulating, wearing it they stay calm and quiet...and other people are happy to hold them for me. Without using prong collars I could not compete in trials, my back would not cope with the pressure of being dragged up and down hills by over-excited dogs! My dogs would dangerously exhaust themselves before they competed. Importantly, no-one would ever be willing to hold my dogs while I was out in front working another! And I (nor anyone else I know) would NOT be happy letting someone else discipline my dog(s) in my absence, just because those dogs are passionate about their work and want to be with me. Without a prong collar these dogs would need harsh discipline to prevent injury to themselves and their "holder". Without the availability of a prong collar, they could no longer do what they were bred for and love most, hunt for game birds in competition against another dog!

I have never seen a dog damaged by a prong/pinch collar in all my 40 years of competition with working dogs. Whereas, I know of numerous dogs destroyed by misuse of electric collars. As a highly successful dog trainer I can testify that electric collars are far more cruel in the wrong hands than prong collars, and can inflict much greater and more permanent damage on a dog. I am interested as to why MPI is considering banning prong collars and not electric collars? Is this due to the influence of the farming sector, where use (and misuse) of electric collars is widespread? I advise I am also a farmer! Both collars are tools, which if used correctly are beneficial for dogs' welfare. Their use should not be banned simply because of irresponsible misuse by a minority.

Robyn Gaskin

s 9(2)(a)



18 May 2016

Veterinary Council of New Zealand (VCNZ) Submission on Animal Welfare Regulations'

Submitter Information

Janet Eden, VCNZ Registrar on behalf of the Veterinary Council of New Zealand

VCNZ is a regulatory body established under the Veterinarians Act 2005. VCNZ's role is to protect the public interest by ensuring that veterinarians are fit and competent to practise. We have a number of statutory mechanisms available to achieve this purpose including:

- setting and implementing minimum standards for veterinary practice
- promoting high standards of veterinary education and conduct
- reviewing and acting, where necessary, in circumstances where concerns about a veterinarian's performance, professional conduct or health have been raised
- registering veterinarians
- recognising as appropriate qualifications for registration by accrediting or approving the institutions which offer them
- recertifying veterinarians through the issue of practising certificates

VCNZ acknowledges the effort made by the Ministry for Primary Industries (MPI) in the process it has undertaken for the drafting and consultation of the proposed new regulations under the Animal Welfare Act 1999. VCNZ is generally supportive of the proposed regulations and this submission is limited to comments on specific aspects of the proposed regulations and pain relief, where there is a possible impact on veterinarians or to procedures that VCNZ has previously submitted on.

Part A

Question 3

Equine tooth extraction and endodontics

We note that the proposed regulations are silent on equine tooth extraction and endodontics. Following discussion with MPI officials we understand that this is because MPI views these procedures as significant surgical procedures (SSPs) under the new definition and therefore has not proposed regulations for these procedures. We acknowledge this view and also agree that equine tooth extraction and endodontics are significant surgical procedures, as noted in our submission in September 2012.

However, given that these procedures are currently undertaken by both veterinarians and non-veterinarians we believe there will still be uncertainty about who can carry out these procedures if there are no regulations put in place. The purpose of regulations is to provide certainty and as the consultation document states 'We will know that the regulations have

been successful when..... there is greater clarity about who is able to undertake certain procedures and those people know what they are allowed or not allowed to do in the performance of a procedure;.’ We also believe there is an identified problem and that regulations would achieve the desired outcome and update practice. The uncertainty and lack of clarity due to the lack of regulations will result in continuing unnecessary and unreasonable pain and distress. We are therefore of the view that regulations need to be made.

Dubbing of poultry

We note that the proposed regulations are silent on the dubbing of poultry. VCNZ previously submitted on the dubbing of poultry. Dubbing purely for cosmetic reasons would be inconsistent with the Code of Professional Conduct for veterinarians. However, Old English Gamefowl are particularly aggressive, and dubbing has been routinely carried out to prevent damage to the very large and floppy combs of this and other gamefowl breeds. While separation of these birds would prevent attacks, there are situations where this is apparently not always possible. We believe that this procedure would be classified as SSP under the new definition. If it is to be exempted allowing lay people to carry it out, then it should be covered in a regulation; pain relief is necessary and the person should be adequately trained and competent.

Part B

Proposals 35, 36, 39, 40 and 41

VCNZ supports these proposed regulations. These proposed regulations reflect previously agreed standards that are based on the NZVA guidelines for the fitness of livestock transport which mirror the MPI Verification Services Disease, Deformed and Injured Animal Welfare Procedures. The NZVA Guidelines have been endorsed by VCNZ. The guidelines describe conditions that would normally preclude transport. However in some cases it may be possible to transport such animals but only if certified by a veterinarian. The veterinarian needs to make a professional judgement whether an animal could be transported.

We are pleased to see that the requirement for veterinary certification has been included in the proposed regulations. While we recognise it would be difficult to build into the regulation, we would not want the regulation to indicate that veterinary certification would be a matter of course or that owners were under the impression that veterinary certification did not require an examination of the animal(s) and a professional judgement to be made i.e. owners should not conclude veterinary certification is automatic just because a veterinarian's opinion is sought. This will have to be left to public education.

Proposal 52 All animals – Embryo collection via exteriorised uterus.

VCNZ has previously submitted that this should be a SSP.

Embryo collection via the exteriorised uterus in sheep requires the ewe to be anaesthetised. In cattle it is usually done non-surgically but in sheep it is quite an invasive procedure. This is a similar process to embryo re-implantation in sheep. Does this regulation cover this also? We believe it is also a SSP.

We suggest this should be *'Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian or an appropriately trained, certified technician. Pain relief must be used at the time of the procedure.'* This would allow non-veterinarians with experience in this field to become certified by a veterinarian to carry out this procedure. We acknowledge that lay people do currently carry out this procedure. We believe that the person needs to be an appropriately trained professional who can safely and correctly use the method of pain relief (local anaesthetic) that has been provided and carry out the procedure to an appropriately high standard.

Proposal 53 Laparoscopic AI

VCNZ has previously submitted that this should be a controlled procedure (the definition of controlled procedures has now been repealed).

We acknowledge that lay people currently carry out this procedure and currently there are dedicated animal breeding businesses with veterinarians involved that have non-veterinarians carrying out this procedure (and others such as embryo flushing and transfer) under their supervision.

We believe lay people carrying out the procedure need to be an appropriately trained professional who can safely and correctly use the method of pain relief (local anaesthetic) that has been provided and carry out the procedure to an appropriately high standard.

We suggest that that this be amended to be *'must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian or an appropriately trained, certified technician'*.

We do not believe this to be onerous since a veterinarian is required to authorise the use of the local anaesthetic or by using a VOI. In either situation the veterinarian must satisfy themselves that the operator is using the RVM correctly. This must involve a training and audit programme such as currently used for lay operators to develop stags.

Proposal 54 All animals – Liver biopsy

VCNZ supports this proposed regulation.

Proposal 56 Cats Declawing

VCNZ supports this proposed regulation. It is consistent with the Code of Professional Conduct for veterinarians which states *'veterinarians must not carry out treatments or procedures on animals that are performed primarily for the convenience of the owner'*.

Proposal 57. Companion animals – Desexing (including stray/feral cats, dogs, and other species)

VCNZ supports this proposed regulation.

Proposal 59. Dog debarking (devoicing of other species)

VCNZ supports this proposed regulation. It is consistent with the Code of Professional Conduct for veterinarians which states *'veterinarians must not carry out treatments or procedures on animals that are performed primarily for the convenience of the owner'*.

Proposal 61 Dogs Dew Claws

VCNZ supports this proposed regulation.

Proposal 62. Dogs Tail docking

VCNZ supports this proposed regulation. Tail docking is contrary to the Code of Professional Conduct for veterinarians which states '*amputation of all or part of a dog's tail without having a justifiable medical reason or because the dog is a particular breed, type or conformation as unacceptable*'.

Proposal 66 Cattle Tail docking

VCNZ supports this proposed regulation.

Proposal 71 Sheep mulesing

VCNZ supports this proposed regulation.

Proposal 74 Horses Tail docking

VCNZ supports this proposed regulation.

Proposal 76 Rectal examination of horses

VCNZ supports this proposed regulation.

Proposal 77 Horses Caslicks procedure

VCNZ supports this proposed regulation.

Proposal 78 Horses Castration

VCNZ supports this proposed regulation.

Proposal 79 Llama and alpaca Castration

VCNZ supports this proposed regulation.

Pain relief

The Code of Professional Conduct for veterinarians states that '*treatments or procedures must...only be performed with appropriate pain management*', with the following explanatory notes: '*All surgical and some non-surgical procedures involving tissue damage can be expected to be painful. Analgesia must be included in the planning for all potentially painful procedures. An analgesia plan must be tailored for each patient and type of procedure, and be continued for an appropriate period after the procedure*'.

VCNZ supports the proposed definition but notes that it does not include ongoing pain relief post operatively. We believe the definition needs to be broadened to address this, in line with VCNZ's position on this. While there may be difficulties currently in implementing this (e.g. administration, cost, risks of abuse of the product etc) we believe the definition should be broadened so at least it signals that post-operative pain needs to be recognised. We suggest that there is a stepwise progression to a future regulation that will require post-operative analgesia. The concept and requirement needs further discussion and socialising. In the meantime we would suggest concentrating on promoting the use of general or local

anaesthetics to prevent an animal feeling pain throughout the surgical procedure, which is in line with the proposed definition of pain relief.

We believe that it is appropriate for a veterinarian to authorise a non-veterinarian to hold and use pain relief, providing the procedures and controls are followed in accordance with either the requirements for authorisation or issuing veterinary operating instructions. This is already occurring e.g. de-velvetting stags under the present NVSG scheme and some non-veterinary providers of calf disbudding. While there will be an additional cost for the use of pain relief we believe this should not be a deterrent or an argument against its adoption. We would support a phased introduction to allow for acceptance and implementation.

If you have any questions or require clarification please contact Janet Eden at

§ 9(2)(a), or phone on § 9(2)(a)

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