

		<p>not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p>http://safe.org.nz/nz-dairy-industry-exposed</p>
Proposed	Young Calves	Same day slaughter
		<p>I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p>
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		<p>I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.</p>
45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>dd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		<p>I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.</p>

47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper¹ does not demonstrate that:</p> <p>is in fact the case in calves <5 days of age or</p> <p>at these calves are not experiencing significant hunger or</p> <p>that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study²</p> <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>dd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>owles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves¹ we propose an increase in the infringement penalty to \$1000.</p> <p>Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		<p>I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.</p>
50	Young Calves	Transport by sea across Cook Strait prohibited
		<p>I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.</p>
Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		<p>I support the prohibition of hot branding and the penalty of prosecution.</p>
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		<p>I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).</p>

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

		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. Pain relief must be used at the time of this procedure.
63	Cattle	Teats
		<p>I support the proposal for supernumerary teat removal of animals >6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals <6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that:</p> <p>maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age</p> <p>i) infringement penalty of prosecution</p> <p>n relief is required for any supernumerary teat removal procedure regardless of age</p> <p>ii) infringement penalty of prosecution</p> <p>procedure is performed using sterilised equipment</p> <p>iii) infringement penalty of \$500</p> <p>y person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian</p> <p>iv) infringement penalty of prosecution</p>
64	Cattle	Claw removal
		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.
65	Cattle	Teat occlusion
		I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking
		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)

		I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking
		I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking. Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months. I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male. I support the proposed penalty of prosecution for infringements in sheep > 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use. I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep < 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep <2 months of age and a penalty of \$300 for lack of NSAID use.
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting

		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses
		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty. I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.
79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.
80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of

		use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.

Regards, Lisa McEwan

Lisa McEwan

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Out of Scope

From: Jane Riley § 9(2)(a)
Sent: Saturday, 14 May 2016 5:43 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Categories: Green Category, Blue Category

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

Jane Riley

§ 9(2)(a)

§ 9(2)(a)

Proposals

Agree - means agree with entire proposal as presented.

1. Disagree -Use of Electric prodders should be prohibited
2. Disagree - Goads should be prohibited
3. Disagree -propose twisting the tail of an animal at all
4. Agree - prohibit the use of pinch and prong collars on dogs
5. Agree
6. Agree but add 'must allow the dog to open its mouth sufficiently to enable panting AND/OR drinking'.
7. Agree - minimum standard 5 should also remain re heat distress.
8. Agree - Penalty should be A prosecutable regulation offence. and include a criminal conviction. Maximum penalty fine of \$5,000 for an individual, \$25,000 for a body corporate.
9. agree with some parameters around working dogs being unsecured (i.e. maximum speed at which vehicle can travel should be set)
10. Agree
11. Agree
- 12 Agree - except remove be otherwise insensible - this is not specific enough
13. Disagree goats should not be tethered.
14. agree
15. Agree
16. Disagree - horses and donkeys should not be tethered
17. Agree
18. Agree
- 19 Agree
20. Agree
21. Agree
22. Agree

23. Agree
24. Agree
25. Agree
26. Agree
27. Disagree - farrowing crates should be banned
28. Agree
29. Disagree - Rodeos should be banned failing that agree - fireworks should be banned at Rodeos.
30. Disagree - ban any animals in circuses.
31. Agree - Penalty should be minimum of \$1000
32. Agree
33. Agree.
34. Agree - infringement offence should be minimum of \$1000 per animal
35. Agree
36. Agree
37. Agree
38. Disagree - any of stipulated animals with a lameness score of TWO must not be transported
39. Disagree - injured animals should not be transported
40. Disagree - doesn't go far enough - no animal should be transported less than a week before giving birth
41. Disagree - An animal with a burst, distended, or necrotic udder or an animal with mastitis where there are signs of fever or the udder is hot, red, swollen, discharging, or necrotic must not be transported at all.
42. Disagree - A cattle beast or sheep with a cancer eye greater than 2cm in diameter and not confined to the eye or eyelid, or that is bleeding or discharging, must not be transported at all.
43. Agree
44. Agree - add access to clean drinking water
45. Disagree - Young calves should not be slaughtered.
46. Disagree
47. Disagree - this timeframe is too long - should be within two hours -this timeframe should not be extended
48. Disagree - this is too long - should be no more than 4 hours.
49. Agree
50. Agree
51. Agree
52. Agree
53. Agree
54. Agree
55. Agree plus pain relief must be used
56. Agree
57. Agree
58. Agree
59. Disagree - dog debarking should not be permitted
60. Agree
61. Agree
62. Disagree - tail docking is unnecessary and should be prohibited
63. Agree - except Supernumerary teat removal (up to 6 weeks of age)—MUST performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian (not by any person).
64. Agree
65. Agree
66. Agree
67. Agree except pain relief must be used at time of procedure (under 6 months)

68. Agree
69. Disagree Debudding should be done instead of dehorning
70. Agree - addition pain relief must be used at time of procedure (under 6 months)
71. Agree
72. Agree
73. Agree
74. Disagree - tail docking should be prohibited
75. Agree
76. Agree
77. Agree
78. Agree
79. Agree
80. Agree
81. Disagree - for pigs under 7 days - same conditions as for pigs over 7 days (vet /supervision and pain relief)
82. Agree
83. Disagree - dubbing should be prohibited
84. Agree
85. Agree

Additional submission comments

Agree with proposal that the offences for contravention of the regulations (infringements and prosecutable offences) will all be strict liability offences.

Education should occur in addition to a prosecution or infringement - not instead of as this provides a loop hole - ignorance is no defence of the law.

Ongoing animal education for all sections of society should be happening anyway - especially for those involved in animal production and slaughter. They should not be able to operate without having the education.

Defence needs to be very specific with regard to the act of omission constituting the offence - e.g. what is a circumstance of stress - this is currently too 'fluffy' what does it actually mean , it could be misinterpreted unintentionally or even deliberately to harm animals.

No lead in period - regulations should be introduced as a matter of urgency.

Agree that adhering to a code should NOT be allowed as a defence for the strict liability offences in the regulations (see section 4.1.5).

Farm animal complaints should not be dealt with by MPI but rather by RNZSPCA or another independent animal welfare body.

MPI should engage with stakeholders by consultation , however they should not be influenced by economic considerations over animal welfare.

Agree regulations relating to young calves should be implemented earlier to have effect during the main calving season in spring 2016.

Are there any minimum standards or additional matters that you think should be considered for regulation in the future, once the implications of regulating these areas are better understood? Yes All testing on animals for any purpose should now be banned - it is 2016, Humans and Animals are not the same - test human drugs on humans - at least they have the choice.

Rodeos - should be banned as a matter of Urgency, as should Greyhound racing due to the negative impact on animal welfare. Rodeos also give the impression this kind of cruelty is acceptable in our society.

Live Animal Export Regulations

- 1. The conditional prohibition on the export of livestock for slaughter will be moved into regulations under the Animal Welfare Act 1999. Do you have any comment on this transition occurring in the second half of 2016?**

Agree - as soon as possible

- 2. Do you have any comment on the proposed regulatory offence and penalty for non-compliance with the conditional prohibition on the export of livestock for slaughter? Agree with the principle - Fines stipulated should be minimum not maximum**
- 3. Do you have any comment on the proposal to repeal the legislative provision "Guidelines for issue of animal welfare export certificates" by late 2016? (Refer section 41).**
- 4. Do you have any comment on the proposal to bring into force, by late 2016, the new provisions of the Act that expand the matters the Director-General of**

MPI must or may consider when assessing an application for export? (Refer section 43).

- 5. Do you have any comment on the proposal to bring into force, by late 2016, the new provisions of the Act that allow the Director-General of MPI to impose conditions on an animal welfare export certificate? (Refer section 45).**
- 6. Do you have any comment on the proposal to bring into force, by late 2016, the new provision that allows the Director-General of MPI to refuse to issue an animal welfare export certificate, or revoke or amend a certificate? (Refer section 46).**

Jane Riley

s 9(2)(a)

Date

RELEASED UNDER THE OFFICIAL INFORMATION ACT

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Out of Scope

From: Michelle Andrews <59(2)(a)>
Sent: Thursday, 12 May 2016 1:35 p.m.
To: Animal Welfare Submissions
Subject: Submission for the consultation on proposed animal welfare regulations

Categories: Blue Category

Hi there

I support the views of the SPCA, as below:

Not transporting bobby calves before they are 10 days old.

- Not confining bobby calves for longer than 2 hours while awaiting transport.
- Providing proper bedding for bobby calves awaiting transport.
- Providing proper bedding for bobby calves during transport.
- Ensuring better and more humane methods for loading and unloading bobby calves. Throwing animals is completely unacceptable.
- The time and distance bobby calves are transported should be limited – and drivers should be trained to drive appropriately.
- If a bobby calf is to be slaughtered, this should be done on the same day as transport and should be done quickly and humanely.

As the most intelligent mammal it is up to us to do the right thing and treat all living animals with respect. These bobby calves are treated inhumanely and we need to stop this from happening.

These calves feel pain and fear and this process is traumatic enough the very least we can do is to make it more humane. How we treat animals who do not have a voice and cannot speak for themselves is a reflection of us as a nation and as a people and I for one would rather be known for compassion and respect than for torture and cruelty. We need to stand up for those who do not have a voice and do what we can to show we care.

Regards
Michelle Davenport

From: Rhonda Findlay <s9(2)(a)>
Sent: Wednesday, 11 May 2016 4:44 p.m.
To: Animal Welfare Submissions
Subject: LACK OF PUBLIC CONSULTATION

Follow Up Flag: Follow up
Flag Status: Completed

Dear Ministry of Primary Industries

I have only recently found out about the submissions due for upgrading some of the animal welfare codes to regulations.

Even though I had registered to receive relevant MPI animal welfare information and received the Horse and Donkey Code information not long ago, I never received anything on this very important issue. Why have all those who made submissions on the Animal Welfare Act not been automatically informed of this? I understand there was a consultation about the regulations in the region I live but neither I, nor any people I know who are interested in this issue, knew anything about it. I contacted MPI at the end of last year specifically inquiring as to when the codes would be upgraded to regulations. I was postponing the making of formal complaints re lack of shelter for cattle, sheep and horses until the upgrade, and certainly wanted a say in the matter before any regulations came into place. I was told by an MPI staff member who checked with another staff member that the first upgrades would take place this year, there would be public consultation, and the individual species would likely be dealt with separately.

I am alarmed that all the species and codes have been lumped together for consideration. Looking through the huge document, there are so many important issues involving many different species. The time given for the public to respond on all these issues is very short. The whole process has not been very fair nor in the best interest of the animals. The document includes some positive steps for animal welfare and I believe the regulations are also an improvement for dealing with non compliance in a more effective and realistic way. Rushing this process will not give the optimum outcome, especially for some species, such as crustaceans. For example, if the rendering 'insensitive' is not dealt with properly, the suffering could actually increase, with not only crustaceans being boiled alive but ineffective electric shocks also taking place beforehand. This is a very sobering thought. It is vital that important definitions and evidence of insensitivity, for example, are properly and widely scrutinised and discussed through public consultation.

It is not possible in this short time for people like myself who work, to prepare submissions on the many issues and numerous species the regulations will cover, nor for those who are concerned, have much experience and knowledge on these matters. Please put a halt to this process, abandon the May 19th date and restart the consultation process in a manner that Min. Nathan Guy promised (publicly and in a email last November to me).

Yours sincerely

Rhonda Findlay

SUBMISSION ON REGULATIONS

I think regulations are a positive step for animal welfare and an improvement for dealing with non compliance in a more effective and realistic way. The draft makes quite a few improvements for some areas of animal welfare.

MPI has had over a year to prepare this draft but the public have had only a few weeks to consider this lengthy document entailing many important issues and different species. Even though we made earlier submissions on the AWA, many of us have had less time than this, only finding out about this draft at a later date. I, like many have not had time to properly read and assimilate the long draft document. I have therefore only mentioned some issues. Lack of mentioning other issues does not mean I do not agree with the regulation, nor am not interested, only that I have not had the time to properly read and consider it.

The term *therapeutic* with its connotations, used in many of the regulations is too weak – there should be a more definite term such as *medical* reasons.

Penalties: I think some of the penalties in the regulations are too low. For example, \$300 for causing pain to an animal through deliberate misuse of a pain-causing instrument such as an electric prod or a goad to sensitive body areas, is not sufficient, especially where there is no criminal conviction either.

Sheep: tails - *cut flush* is not clear wording; a measurement of length left would be clearer, or wording to make it clear that a little tail should remain.

Muesling should be fully prohibited. The term *therapeutic* is not strong enough and a weak excuse could be used.

Transport of injured sheep/other animal

The wording does not appear to discriminate between travelling long distance and just down the road to a house, so a sheep can be better looked after and be kept an eye on. The wording needs to allow for whatever is in the best interest of the animal, otherwise the regulations will force the animal to stay put, when a vet is unlikely to be called in, especially in weekends.

Tail docking:

Yes, should be prohibited, for dogs, cows and horses but once again the word *therapeutic* is too soft. The words should be clarified in the dog regulations so it only refers to an **already existing** injury. Otherwise the word *therapeutic* might be used in much the same way *extraordinary circumstances* was used to permit battery hen farms. The same applies to ear cropping.

Tail twisting, use of goads in areas- for all animals: I agree should be prohibited.

Shelter/Shade:

I am very concerned that shelter is only in reference to a few breeds such as dogs, with low penalty (\$300 and no criminal conviction) or young animals (calves) and is not to be enforced through regulations for all animals. The codes, particularly the Dairy Code of Welfare waters down the AWA requiring this basic for all animals.

Yes, calves should have access to shelter before being transported. But shelter should be a requirement at all times and not just for young calves but cattle too.

The codes are not being enforced at all in this area. After laying complaints with MPI about 30

properties having absolutely no shade for sheep, cattle or horses a few summers ago, the codes had no legal effect and the burden of proof for court realistically meant the animals had to also have no water and the suffering could be proved physically, even though I had no right to go on to the properties. Without regulations, the MPI staff who admitted there was no shade did not even talk to the owners or farmers concerned, nor even ask them to provide shade in the blistering sun which appears with global warming to burn stronger every year. This year was the same for many animals. Minister Nathan Guy told me I should report any such cases to MPI – what a joke! Therefore I have been waiting for the shelter codes to upgrade to regulations so something could be done about this shameful widescale problem.

The codes should upgrade to regulations without question for all animals. Realistically, shelter requirements would have to be phased in for farm animals, to give time to grow trees or provide shelter, and it could start small scale where animals can move in and out of shelter areas, but eventually where all animals can take shelter at the one time if needed. But shade which is part of shelter under most codes should be not be phased in, but regulated immediately. It is easy and inexpensive to provide shade – anything that casts a shadow provides shade, so whether it is shadecloth, cardboard, scrap iron, timber, tarpaulin, a parked car, or old rugs or sheets, it can be quickly and easily provided.

Please urgently reconsider upgrading shelter/shade codes to regulations, as I was led to believe they would be. As the weather becomes more unpredictable and extreme, it is increaingly becoming a welfare issue. MPI needs to address the current situation as well as think ahead.

Blunt Force -calves: this should be permitted in an emergency where the animal is or would be suffering more if death by blunt force did not occur; for example if there was a bush fire and there was no time for evacuation.

Drowning a cat or dog: I am unsure whether this should be made a regulation and potentially downplay the weight of the law. However given the low conviction rate and cost involved, it is worth considering. Any regulation on this must include criminal conviction as draft indicates. Any regulation should not just apply to cats and dogs but all animals

Hens,pigs and factory farmed animals: there should not be regulations on the severe confining of animals, but an appropriation of the law that requires all animals have the five freedoms.

Eels: the regulations need to be more specific about how to render eels insensitive for desliming, and also appropriate killing methods. In my region, children have been chopping the feet off eels -there is much confusion about where the nerves are and the best body area for kill. Consequently eels are suffering in the hands of many individuals.

Should children be allowed to kill any animal?

Crabs, Crayfish, Lobster – Rendering insensitive :

I am concerned that rendering insensitive may not be effective especially with electric stunners and the suffering would be made even worse. What standard must the stunners meet? This decision could not be left with restaurants, where cheap *Made In China* electric stunners, promising to render insensitive would likely be like the cheap Warehouse smoke detectors that apparently meet a standard but barely make it through a week without malfunctioning. I would hate for these crustaceans to not only be boiled alive but suffer numerous shocks beforehand (like the horror electrocution scene from *The Green Mile*). Shouldn't this regulation also include all crustaceans as

fridge chilling is easily available to all people?

Thank you for considering my submission.

Rhonda Findlay

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Additional Submission (i.e. two submissions from this person) 158

From: Rhonda Findlay <s9(2)(a)>
Sent: Wednesday, 11 May 2016 4:44 p.m.
To: Animal Welfare Submissions
Subject: LACK OF PUBLIC CONSULTATION

Follow Up Flag: Follow up
Flag Status: Completed

Dear Ministry of Primary Industries

I have only recently found out about the submissions due for upgrading some of the animal welfare codes to regulations.

Even though I had registered to receive relevant MPI animal welfare information and received the Horse and Donkey Code information not long ago, I never received anything on this very important issue. Why have all those who made submissions on the Animal Welfare Act not been automatically informed of this? I understand there was a consultation about the regulations in the region I live but neither I, nor any people I know who are interested in this issue, knew anything about it. I contacted MPI at the end of last year specifically inquiring as to when the codes would be upgraded to regulations. I was postponing the making of formal complaints re lack of shelter for cattle, sheep and horses until the upgrade, and certainly wanted a say in the matter before any regulations came into place. I was told by an MPI staff member who checked with another staff member that the first upgrades would take place this year, there would be public consultation, and the individual species would likely be dealt with separately.

I am alarmed that all the species and codes have been lumped together for consideration. Looking through the huge document, there are so many important issues involving many different species. The time given for the public to respond on all these issues is very short. The whole process has not been very fair nor in the best interest of the animals. The document includes some positive steps for animal welfare and I believe the regulations are also an improvement for dealing with non compliance in a more effective and realistic way. Rushing this process will not give the optimum outcome, especially for some species, such as crustaceans. For example, if the rendering 'insensitive' is not dealt with properly, the suffering could actually increase, with not only crustaceans being boiled alive but ineffective electric shocks also taking place beforehand. This is a very sobering thought. It is vital that important definitions and evidence of insensitivity, for example, are properly and widely scrutinised and discussed through public consultation.

It is not possible in this short time for people like myself who work, to prepare submissions on the many issues and numerous species the regulations will cover, nor for those who are concerned, have much experience and knowledge on these matters. Please put a halt to this process, abandon the May 19th date and restart the consultation process in a manner that Min. Nathan Guy promised (publicly and in a email last November to me).

Yours sincerely

Rhonda Findlay

✓ 159

From: Sara Sutherland <s 9(2)(a)>
Sent: Wednesday, 18 May 2016 4:57 p.m.
To: Animal Welfare Submissions
Subject: submission on animal welfare regulations
Attachments: Comments on the animal welfare amendments.docx

Categories: Blue Category

I have attached my comments on the proposed animal welfare amendments. I have also copy-pasted these into the text of the email in case you are not able to open attachments - they are the exact same document.

Many thanks

Sara Sutherland

Sara Sutherland

s 9(2)(a)

19 May 2016

Animal Welfare Policy

Ministry for Primary Industries

PO Box 2526

Wellington 6140

Submission on Animal Welfare Regulations

I am submitting as an individual, not an organisation. I am a veterinarian with 5 years' experience, mainly in sheep and beef practice. Prior to becoming a veterinarian I worked for 20 years as a farmer and a shepherd in New Zealand and overseas, and I still do casual work on sheep farms occasionally. I have experience with a range of different farm operations and operators, and a clear understanding of what good stockmanship looks like.

my email address is s 9(2)(a) my phone number is s 9(2)(a)

Proposed Animal Welfare Regulations – Care & Conduct and Surgical & Painful Procedures

I strongly support the introduction of animal welfare regulations as a means of identifying and enforcing required standards of animal welfare. It is important for people involved with animals to be aware of societal and legal expectations with regards animal welfare. My experience has been that MPI animal welfare inspectors and NZSPCA inspectors are very good at using education as a first line for animal welfare issues, which is important as most cases are due to ignorance not to wilful ill-treatment. However it is important that they are able to have stronger tools at their disposal where education is not sufficient.

Question 1 are the reasons the amendments to the act should not come into force immediately? None that I can think of.

Question 2 – I believe that the infringement fee of \$500 is not enough for cases of repeated offences or multiple animals affected. Higher fees (\$1,000 at least) should be issued where people have been previously charged, paid their fee, and continued to fail to comply; or situations where multiple animals are affected and education has not been successful in stopping the infringement.

Question 4 – anything else that should be included in the future – body condition scoring of cattle and sheep is relatively objective using the scoring systems published by dairyNZ (for dairy cattle) and beef and lamb NZ (for sheep). It would be useful to include something for owners not investigating or remedying situations where large proportions of their herd are allowed to fall below a minimum body condition score. This would also apply to, for example, lifestyle blocks with sheep that are not adequately fed and never treated with anthelmintics; or dairy farmers who routinely overstock (not including unexpected weather events that lead to temporary overstocking).

Question 8 – will the regulations change the way you, or others, operate? I think it is important to have clarity around these regulations and education of animal owners and veterinarians. For example, many farmers are unaware of the existing requirements for maximum age limit for castration without anaesthetic and dehorning. The requirement for pain relief for disbudding and dehorning will stop the practice of doing this without anaesthetic and this is about 10 years overdue. The benefit of changing the requirement is much greater than the extra cost (which in the case of disbudding is very low – 20 to 50 cents per calf).

Question 9 are these penalties enough for low-level offending? \$300 appropriate for low offences, \$500 not enough for moderate or repeated offences – raise to \$1000 as previously discussed (Question 2).

Question 13 should it be changed to “human or animal life?” There are some circumstances where this would be appropriate but others where it would not. For example, saving an animal life should not be a greater importance than saving a human life. Saving an animal life when that means it will live with great suffering is not appropriate. But in general yes, there should be exemptions for some situations of stress or emergency. This does not apply to the majority of the specific situations covered by the legislation. For example, take the prohibition on ear cropping dogs for cosmetic purposes. It is not acceptable to say that the owner of the dog would euthanize the animal if it did not have cropped ears and therefore the act was necessary for the preservation of animal life!

Question 16 I support the second approach whereby the codes of welfare are amended only where the regulations provide a higher standard as this would allow the codes of welfare to continue to come into play in prosecutions for Act offences.

Care and Conduct

10.2.1 Electric prodders – I agree in principle that their use should be restricted. Electric prods are used in two situations – to encourage animals to move into an area they don't want to move into, or to encourage an animal to rise (for example a cow recovering from milk fever). What about changing it to "electric prodders must not be used except where the safety of the animal or handler is at risk, and should not be used to cause unnecessary pain and distress to the animal". This would allow extreme circumstances such as needing to move an animal away from a danger area quickly, while avoiding the use in circumstances where the problem is poor pen design or race design inhibiting animal flow, and discouraging routine use of the electric prod instead of improving stockmanship and facilities to allow animal flow. I also don't understand why there should be an exemption for moving into the stunning pen, since in the view of the animal it is not any different than moving into a catch pen in a set of yards. Good stockmanship and pen and yard design should avoid the necessity of using electric prodders. However, there are circumstances where an electric prod is useful for encouraging a down cow to rise (after metabolic issues have been corrected) because the transient pain of the electric prod is less harmful than leaving the animal down. Electric prodders are not effective in sheep (they cause them to freeze instead of moving forward) and so should not be used in animals other than cattle. I don't know enough about circus animals to comment.

10.2.2 I agree with this restriction

10.2.3 Needs to be clear that twisting a tail is different from lifting a tail.

10.2.4 – I don't see any legitimate use of prong collars. Even for law enforcement and defence. Police dogs can be trained, and prong collars are unnecessary for training. Their sale should be prohibited.

10.2.5 the restrictions are appropriate, and could cover all species to avoid unnecessary duplication (allowing panting is of course only important to dogs).

10.2.22 camelids must always have another animal as a companion – sheep and cattle are highly social animals and stressed by being alone, but this may be done on lifestyle blocks. Why would there be a regulation about camelids and not about other herd animals?

Also – what about isolating an injured animal so that it doesn't harm itself more by moving around, or isolating a sick and potentially infectious animal so that it doesn't infect herdmates? Should the restriction be clarified so that an animal that is isolated due to illness or injury must be able to see herdmates?

10.2.28 suitable nesting material for sows – why not just say "nesting material that can be manipulated" to avoid material that can be manipulated but is not suitable for nesting?

10.2.32 use of moving vehicles as traction – I have heard of this happening but never heard of it working. I agree that this should be regulated, and education is required so that owners are aware of the prohibition.

10.2.33 dehorning is included in the section on painful husbandry procedures – i.e. if an animal has an ingrown horn this should be removed with provision of pain relief

10.2.34 I agree that transport of animals should not result in cuts or abrasions, but hopefully this would not replace the existing regulation which goes much further in specifying that stocking density must be sufficient to allow animals to adopt a natural posture and allow animals to rest. They are two separate issues.

10.2.35 this does sort of duplicate 10.2.33 in that if it is not permitted to allow an animal to have an ingrown horn that implies that it is also not permitted to transport said animal.

10.2.38 Sheep lameness. There is no physiological reason to exclude lame sheep from legislation, in that sheep do suffer from lameness, lameness is painful to sheep, and transporting lame sheep does carry the risk of exacerbating the injury and increasing the pain and suffering of the animal. The issue with sheep is that best practice for control of footrot includes culling animals that do not respond to treatment – this means that best practice involves transporting lame animals which is illegal. A reasonable solution to this issue would be to clarify that animals with a lameness score of 2 can be transported with a veterinary certificate, and conditions as for cattle (transport to the nearest slaughter premise, at reduced density, etc...) but sheep with a lameness score of 3 should be treated or euthanized on farm. There may be situations where a large number of sheep become lame from footrot and many of these would be a lameness score of 3 – in this situation it can be challenging and time-consuming to work out which sheep have a lameness score of 2 and which have a lameness score of 3. However this should be done by a veterinarian who will be able to determine whether the animals are suitable for transport. The advantage of including sheep in the legislation outweighs the extra cost of involving a veterinarian in making that decision with large numbers of sheep.

Should horses also be included?

Also – as I read it, the proposed regulation would allow mildly lame animals (lameness score of 1) to be transported without a vet certificate – should there be conditions on this such as transport to the nearest slaughterhouse, upper limit of time to slaughter, reduced stocking density, etc.... to avoid them becoming more lame in transit?

Are animal owners likely to be able to identify animals with a lameness score of 1?

Who should be liable? If the transporter is aware of the lameness but chooses to transport the animal anyway, then they should be liable. If the farmer is aware of the lameness but chooses to send the animal to the works, then they should be liable. If both occur then both should be liable, this avoids one party trying to put the blame on the other.

10.2.39 I see no reason to divide lameness due to injury from lameness due to disease. It is usually unnecessary and unreasonable to transport a lame animal whether the lameness is due to disease or injury. Transport of animals with a lameness score of 1 or 2 should be only with a vet certificate and conditions, and animals with a lameness score of 3 should not be transported *regardless of whether they are lame due to disease or injury*. Horses could also be included in this legislation.

Section 11 young calf management

Would it be sufficient for farmers, transport companies and meat processors to sign a single declaration each season that would cover the entirety of their operations or is it necessary for individual declarations to be signed for each consignment of animals? In essence, this is the difference between signatories affirming in advance that they will abide by the terms of the declaration for all relevant animals versus them certifying at the point of handover or slaughter that they have done so in practice for specific groups of animals.

If this is done it should be audited (by MPI or the SPCA) to show that the facilities are in place. This would add to the work already done by these organizations and may not be tenable.

No issues with any specific proposals.

Section 12 Surgical procedures and pain relief

12.4.52-54 embryo transfer and laparoscopy are more technically demanding and have the potential to cause more pain to the animal than liver biopsy – the only difference is that apparently some technicians are currently performing the first two. All these are significant surgical procedures and should ONLY be carried out by a veterinarian or veterinary student under supervision.

12.4.56 Declawing of cats is NEVER in the best interests of the animal and should be expressly prohibited. Euthanasia is NEVER the only alternative to declawing. The term declawing should be replaced by “digital amputation” since that is what it is. Digital amputation for cosmetic reasons should be prohibited in New Zealand. This procedure is extremely painful and difficult surgery and there is no justification for doing this procedure, except for rare and isolated cases of therapeutic necessity. The loophole that the surgery can be done if attempts to change the behaviour of the cat (so that it doesn’t scratch furniture) have failed should be removed. The long-term pain and discomfort associated with this procedure is far more significant than the loophole implies. There is no justification for declawing cats, and allowing the surgery in some circumstances where attempts have been made to modify the behaviour of the animal implies that the surgery is less painful or distressing than tail docking or dewclaw removal when in fact it is much more painful and distressing, as well as having long-term behavioural consequences to the animal. The loophole also implies that euthanasia is the only alternative in some situations which is ridiculous. There are many, many other alternatives to digital amputation – these include providing scratching posts, training the cat, limiting the area the cat can access, gluing pads onto the claws to prevent damage, selling the furniture, etc... The only negative consequence to a cat having claws is that it might damage some furniture – there is no animal health or human health issue. Equating scratched furniture as more important than the health and welfare of the cat is not acceptable in New Zealand society. Declawing (digital amputation) of a cat is NEVER in the best interests of the animal. The first page of the document said that owners commit an offence if they cause unnecessary pain and suffering to an animal – declawing is always unnecessary. This procedure should be explicitly prohibited except in the very rare situations where it is required for therapeutic reasons. We do not have legislation explicitly explaining that only a veterinarian can amputate the leg of a cat or dog and only under anaesthetic and not for cosmetic reasons – declawing is in the same league. Like ear cropping, it is an unnecessary procedure that confers no benefit to the animal or to animal management. However the surgery is much more difficult and more painful and more significant than ear cropping. It should be absolutely prohibited.

12.4.62 yes, this procedure should be limited to therapeutic purposes only.

12.3.64 claw removal of cattle – I have never heard of a non veterinarian attempting this procedure, or of a veterinarian attempting this procedure without pain relief.

12.4.66 yes, this procedure should be limited to therapeutic purposes only.

12.4.67 castration and cryptorchidism – I believe the 6 months age limit is appropriate, even though it is more for convenience than physiological reasons – perhaps changing the wording to “as early as possible and no more than 6 months”? Also, Burdizzo emasculation should be included in the regulations. Although not common in New Zealand the equipment is commonly used in some overseas countries and I know of cases where people have used this technique in cattle. It is likely to cause just as much pain as using rubber rings and should have the same controls attached to it.

12.4.68 disbudding This is a huge improvement to make pain relief required at all ages. There needs to be a comprehensive training programme for individuals to perform the procedure correctly and safely and to ensure that the local anaesthetic is placed correctly and that sufficient time elapses to ensure that pain relief is provided. Veterinarians will still have the responsibility for authorising the use of local anaesthetic and it may be that not all farmers or technicians who wish to access local anaesthetic will meet the required competence to be dispensed local anaesthetic. Additionally, there is no requirement for veterinarians to authorise Restricted Veterinary Medicines to any client in all circumstances. Managing animal health and welfare remains the responsibility of the authorising veterinarian. For deer de velvetting, the proposal includes the sentence **“Before veterinary approval can be issued, the veterinarian must be satisfied that the person has the relevant expertise, practical experience, drugs, equipment and accommodation to perform the surgical procedure competently.”** This could also be included in the disbudding and dehorning regulations, to ensure that non-veterinarians are able to provide sufficient pain relief for the procedure. General comment – there are products licenced in Australia for pain relief that are easier for the farmer to use, for example oral meloxicam (NSAID) for lambs, topical local anaesthetic (instead of injectable). Since these are available overseas it is likely that they will become available in New Zealand at some point in the near future. Since we expect that these updated regulations will be in force for 5-10 years before they are updated, it may be possible for these products to be available during the lifetime of this legislation. The main barrier for non-

veterinarians to use pain relief is the difficulty of administration (injecting local anaesthetic accurately over the nerve for example) rather than the cost. Therefore it may become possible for pain relief to be available which would not require the comprehensive training programme that the current methods of providing pain relief do. Hot iron or gas cautery disbudding is the most effective means of disbudding to ensure that the horn bud is removed or destroyed. Caustic pastes should be prohibited as they act slowly, are often ineffective and can cause injury to other parts of the body if the paste is transferred from another animal. Pain relief should be necessary regardless of which method is used. There is a body of evidence about pain relief during disbudding that shows that disbudding with local anaesthetic only still provides significant cortisol release and pain-related behaviours compared with disbudding under general anaesthesia (which should be performed by a veterinarian only for obvious reasons!). I support on principle that it would be better to say pain relief at the time of the procedure and on-going, however the anaesthetic options currently available may not be good enough to include this. A 12 month lead-in period should be enough.

12.4.69 dehorning – if this were changed to 6 months instead of 9 months it would be in line with other significant surgical procedures such as castration and tail amputation. Why make it 9 months instead of 6?

12.4.70 tail docking. The phrase “must not be flush” should be replaced with “the tail stump left must be long enough to cover the anus/ anus and vulva” or “must be left long enough to cover the vulva in females and a similar length in males”, or “long enough to leave the caudal folds attaching the tail to the rectal muscles” as is current best practice. In terms of protecting from fly strike, there is no advantage to cutting the tail shorter than this. Cutting tails too short reduces the strength of the coccygeal muscles and has potential to increase the incidence of rectal prolapse. For more details see the journal article (open access) Fisher and Gregory (2007) Reconciling the differences between the length at which lambs’ tails are commonly docked and animal welfare recommendations. Proceedings of the New Zealand Society of Animal Production volume 67 p 32-38.

12.4.75 and 76 rectal pregnancy diagnosis and rectal examination of horses – there is more potential for damage in horses than cattle however trained ultrasonographers do exist who do not damage horses – perhaps an audited system such as deer de velvetting (done under veterinary approval only) would be a better alternative?

However the Caslicks procedure (12.4.77) is a surgical procedure and should be restricted to veterinarians or veterinary students under supervision, and only performed with pain relief.

Thank you for allowing people the opportunity to comment and assist with the development of these important regulations. I ask that submissions be considered on their scientific merit and that the submitter does not have a vested interest in maintaining the status quo rather than improving animal welfare. Any significant surgical procedure must be justified on the grounds of human or animal welfare or safety for it to be considered reasonable in any circumstance to be carried out routinely.

I am very much looking forward to seeing the final form of the regulations.

Best regards

Sara Sutherland, BVSc. MSc. BSc(Agr).



14 May 2016

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

Submission on Animal Welfare Regulations by the Soil & Health Association

Introduction

The Soil & Health Association of New Zealand Inc. (**Soil & Health**) was incorporated under the Incorporated Societies Act 1908 on 4 December 1942. Soil & Health's objectives broadly include soil health and the promotion of organic gardening and farming. It has approximately 3000 members, chiefly composed of home gardeners and consumers, organic farmers and growers, secondary producers, retailers and restaurateurs. Its age and membership make it the oldest and largest representative organic organisation in New Zealand.

Soil & Health recognises that New Zealand animal welfare standards need improving. Every year thousands of animals in New Zealand are farmed intensively, fed high doses of antibiotics, and grains with herbicide residues, kept in unhygienic and cramped conditions, with high levels of stress and injury, unable to express normal behaviours, which runs contrary to the stated principles in the Animal Welfare Act 1999.

As an organic organisation we advocate for the highest animal welfare standards. Organic livestock farming is based on the harmonious relationship between land, plants and livestock, respect for the physiological and behavioural needs of livestock and the feeding of good-quality organically grown feedstuffs. We support the Five Freedoms as set out under the Animal Welfare Act 1999. We believe that any

farming methods that cause animals to suffer or prevent them from expressing normal patterns of behavior should be phased out. This is why we welcome the opportunity to comment on the Proposed Animal Welfare Regulations discussion document (the document), which contains the Government's proposals to improve the enforceability, clarity and transparency of the animal welfare system in New Zealand.

The current animal welfare system does not deal properly with lower-level offending. Soil & Health supports the majority of the proposed regulations in the document in general as they enable the Ministry for Primary Industries to better enforce compliance with the Animal Welfare Act 1999. These include proposals for increasing penalties and infringement fees for offences. However Soil & Health has concerns with some of the proposed regulations and believe that a number of cruel practices outlined, such as colony cages and farrowing crates, should be phased out and prohibited altogether.

Detailed submissions

10. – Care and Conduct Regulatory Proposals

All Animals

1. Electric prodders

Soil & Health supports the proposed regulation in part. Electric prodders are a cruel device. We oppose the exceptions of their use for cattle over 100kg, at a commercial slaughter premise, and for a circus. We believe that alternatives should be found for the intention of moving animals and that electric prodders should only be used when the safety of the handler is at risk. We believe that restrictions should be placed on the possession and sale of electric prodders, as these devices are freely available and sold online with no requirement for information or training to be provided to purchasers. We do however support the proposal being placed in regulation as it means it will be directly enforceable.

2. Use of goads

Soil & Health supports the proposed regulation to prohibit the use of goads to prod an animal in the udder, anus, vulva, scrotum or eyes. The use of goads to move animals causes the animals to become nervous and fearful. The use of electric goads and physical goads such as sticks will obviously cause pain. We support placing the prohibition in regulation as it means it will be directly enforceable.

3. Twisting an animal's tail

Soil & Health strongly supports the proposed regulation to prohibit twisting the tail of an animal in a manner that causes the animal pain. Tail twisting is an unnecessary and cruel practice often used to restrain and move animals and can risk leading to tail breaking, which causes pain and distress. We support the regulation as it provides an enforceable deterrent to tail twisting.

Goats

13. Tethered goats

While Soil & Health does not support the tethering of goats generally, as they are naturally foraging herd animals and tethering them prevents them from expressing their natural instincts to roam and forage freely, we do support the minimum requirement of constant access to food, water and shelter if tethered. However we believe that the word 'shelter' needs to be further defined. Shelter must be defined as providing a space that is clean, dry and has adequate space. As stated in the document, goats are more susceptible to hypothermia than sheep therefore the definition of shelter must also include providing protection from the natural elements including wind and rain, and weather extremes such as snow and hail.

Layer hens

17. Opportunity to express normal behaviours in housing systems

Soil & Health supports the new requirements under 17(a) that hens must have the opportunity to express a range of natural behaviours, becoming part of regulation and thereby becoming directly enforceable.

18. Stocking densities

While Soil & Health supports the proposed stocking regulations becoming part of regulation, thereby making them directly enforceable, we are strongly opposed to the specific stocking densities set out under 18. We believe that stocking hens at this density will not allow them the opportunity to express the range of natural behaviours outlined under 17(a). We believe that for hens to express the range of natural behaviours outlined under 17(a) they must be stocked at 6 birds per m², with a minimum of 18 cm perch space provided for each bird.

19. Housing and equipment design

While Soil & Health supports the housing and design regulations becoming part of regulation thereby making them directly enforceable, we are strongly opposed to the use of closed cages including colony cages for all poultry, not just laying hens. Closed cages do not allow the animals the opportunity to express the range of natural behaviours outlined under 17(a). Chickens are biologically omnivores and

instinctively, when given the opportunity, actively forage for green growing plants, animal foods such as earthworms and insects, wild fruits and some seeds. We therefore believe that if we are going to allow hens the ability to express the range of natural behaviours outlined under 17(a) they must have unrestricted access to outside runs, with at least 50% of the outside run area covered with vegetation at all times, allowing the hens constant access to fresh grass or forage crop containing a diversity of species. We believe that all poultry sheds should have access to good pasture, and be situated to allow for rotation of grazing areas – for example mobile poultry sheds. We believe that adequate nesting space should be provided at a minimum of 7 birds per nest, and that perches should be available in all laying hen housing to a minimum of 18cm perch space per bird.

Pigs

24. Dry sleeping area

Soil & Health supports the proposal that pigs must have access to a dry sleeping area. Failure to provide a dry sleeping area can cause distress and ill health, particularly when a sow is pregnant and is trying to create a nest for her piglets. Furthermore pigs have clean toilet habits and in nature would never defecate near where they sleep. However if left in a confined area then pigs may be left to lie in their own excrement. Providing a dry sleeping area means this would not happen.

25. Lying space for grower pigs

Soil & Health strongly oppose the proposed lying space for grower pigs. We do not believe the proposed spacing will allow for improvement of overstocking behaviour issues such as aggression, nor allow for the pigs to express normal behaviours. Keeping pigs at this density does not allow them to roam, play or dig as they would naturally outdoors. We believe that all pigs should have access to outdoor pasture.

26. Dry sow stalls

Soil & Health strongly supports the prohibition of dry sow stalls and placing the prohibition in regulation thereby making it directly enforceable. Dry sow stalls are an inhumane and cruel practice. Pigs are highly intelligent, social animals. Keeping sows in individual stalls deprives them of their most basic needs such as fresh air, sunlight, clean water and soft bedding, as well as their need to socialise. We support this proposal as it places prohibition in regulation, making it directly enforceable.

27. Size of farrowing crates

Soil & Health supports the proposal as it places prohibition in regulation, thereby making it directly enforceable, however we strongly oppose the use of farrowing crates in general and believe that they should be banned altogether. Farrowing

crates only allow the sow to either stand up or lie down, thereby preventing her to properly mother her piglets. This causes frustration and depression and is therefore an inhumane and cruel practice that we do not support.

28. Provision of nesting material

Soil & Health supports the use of nesting material in the farrowing system. As stated sows have a strong behavioural instinct to build a nest prior to farrowing. With no material for bedding she would scrape her nose over the bare concrete in an attempt to build a nest for her piglets. Not providing materials that the sow can manipulate prevents her from expressing natural behaviours. We therefore support this proposal as it means that any offences of not providing nesting material for sows will be directly enforceable. We however propose that the wording be changed to state "natural material", which should be further defined with a list of specific natural materials to be used such as straw, twigs and grasses. We further propose that the nesting material be a mandatory requirement all the way through farrowing until after the piglets have been raised and weaned.

Cattle

31. Milk stimulation

Soil & Health were not aware of this practice still occurring however believe it is unnecessary and cruel. We support the proposal to prohibit stimulating milk let-down by inserting water or air into a cow's vagina, and placing it in regulation thereby making it directly enforceable. We believe that it warrants regulation so that effective action can be taken if it occurs.

32. Cattle and sheep – vehicular traction in calving or lambing

Soil & Health supports this proposal to prohibit using a moving vehicle to provide tractions in calving or lambing, making it part of regulation thereby making it directly enforceable. We believe it is an unnecessary and unnatural technique that has a high risk of causing injury, pain and distress to both the young and the mother. We support animals birthing naturally without artificial stimulation and force. We believe that it warrants regulation so that effective action can be taken if it occurs.

11.0 Young calf management regulatory proposals

43. Loading and unloading facilities

Soil & Health supports the proposed regulation that facilities must be provided to enable young calves to walk onto and off transportation by their own action.

However we believe that the regulation needs to specify acceptable methods of loading and unloading, for example stating that they must be ramps, or electronic

lifts. We do not believe that the regulations should allow for flexibility for other methods that would enable calves to walk onto and off vehicles, as this may allow for breaches of welfare. We believe all acceptable methods should be specifically stated to provide for full clarity. Further we believe that the time period to allow farmers and other businesses to make arrangements necessary to put suitable loading and/or unloading facilities in place should not be more than 12 months.

44. Shelter on-farm, before and during transportation and at processing plants

Soil & Health supports the proposed regulation in part. We believe that the regulation on shelter should also cover the stocking density of animals in pens. Stocking density should be at a rate that provides enough room for all calves to lie down.

45. Fitness for transport – age

Soil & Health opposes the proposed regulation that young calves must not be transported for processing and slaughter until they are at least four days of age. We believe four days old is an unacceptable age, being too young for travel. As stated in the document the four-day minimum age is not a guarantee that individual calves will be in a suitable physical condition for transportation. While the intention is for the regulation to be read together with those regulations for the physical condition of young calves we do not believe this will happen in practice, and it will also make it more difficult to enforce. We propose that the age be lifted to match that of the European Union of 10 days old, rising to 14 days old for longer journeys over eight hours. Raising the age to 10-14 days means that there is a strongly likelihood that the young calf will be in a suitable physical condition for transportation.

46. Fitness for transport – physical characteristics

Soil & Health supports this proposed regulation. However as stated above we believe by raising the minimum age for transportation to 10-14 days old that this will help to ensure that the young calves are in suitable physical condition for transportation.

47. Maximum time off feed

Soil & Health supports this proposed regulation to reduce the amount of hours off feed from 30 to 24 however we believe that 24 hours is still too long to go without feed for young calves. Naturally a young calf would feed from their mother every 2 to 3 hours. Calves began to feel hunger soon after 3 hours from their last feed, when plasma glucose begins to decline. Hunger then increases gradually for the next 15 hours and then rapidly over the final 12 hours. Leaving young calves without feed for such a long duration is cruel, and also leaves them physically weak. We believe

that 24 hours is an unreasonable maximum period to permit young calves to be off feed when being transported prior to slaughter. We propose that the time period be reduced below 24 hours.

48. Duration of transport

Soil & Health supports the proposed regulation to reduce the maximum amount of time a young calf spends in transportation from 12 hours to 8 hours.

49. Blunt force trauma

Soil & Health supports the proposed regulation to prohibit the use of blunt force trauma for killing calves.

50. Transport by sea across Cook Strait prohibited

Soil & Health supports the proposed regulation to prohibit the transportation by sea of young calves across the Cook Strait. We believe that the infringement fee of \$500 rather than \$300 is a suitable penalty.

12.0 Surgical and painful procedures regulatory proposal

66. Cattle – tail docking

Soil & Health supports the proposed regulation to prohibit tail docking of cattle. We believe it is a cruel and unnecessary procedure especially when there are other alternatives such as switch trimming. Tail docking can lead to significant health problems, including incontinence, hernias, phantom tail pain and increased sensitivity to pain. Further more tail docking does not improve cow hygiene. Tail docking on cattle is a purely anthropocentric procedure that improves comfort for milking personnel only. We support the proposed restrictions that tail docking only is performed for therapeutic purposes (i.e. in response to disease or injury), that a veterinarian or a veterinary student under the direct supervision of a veterinarian must perform it, and that pain relief must be used at the time of procedure.

67. Cattle and sheep – castration and shortening of the scrotum

Soil & Health supports this proposal in part. We propose that castration and shortening of the scrotum only be permitted at a young age of less than 6 months. Castration beyond 6 months of age should be banned. We support the proposed regulation that only conventional rubber rings must be used for this procedure as it helps to minimise the level of pain and distress an animal experiences. We also support the use of pain relief at the time of the procedure.

69. Cattle, sheep, & goats – dehorning

Soil & Health supports this proposal in part. We propose that dehorning only be permitted in the budding stage. Dehorning is a painful procedure. Studies have shown that dehorning stimulates both an acute pain response and a delayed inflammatory reaction. Young animals tend to recover quicker and have fewer complications than animals dehorned at an older age. It is generally accepted that the younger the animal, the less painful the procedure. We do however support the proposal to make pain relief mandatory at the time of the procedure.

70. Sheep – tail docking

Soil & Health supports this proposal in part. We propose that tail docking be banned on sheep i.e. over 12 months of age. We understand that tail docking of sheep has benefits such as reducing problems like fly strike. However tail docking is a painful procedure so restricting it to lambs will result in less pain and therefore reduce the impact of the procedure on the animal. We support the rest of the proposals for tail docking under 6 months of age and tail docking over 6 months of age and believe it provides a clear mandatory standard for the procedure. However we believe that the tail length should be further specified as the current wording “must not be cut flush” is unclear and confusing.

71. Sheep – mulesing

Soil & Health strongly supports the proposal to prohibit mulesing of sheep and placing this prohibition in regulation, thereby making it directly enforceable. This procedure is one of the most barbaric and cruel practices carried out in the farming industry. It is an extremely painful practice and lambs have been seen to demonstrate abnormal behaviour indicative of extreme pain for days afterwards. We believe that the most humane alternative to sheep mulesing is to breed sheep to have low wrinkles, fewer dags and less wool around their breech, and that this should be a stated objective. Other effective alternatives are tailing docking of lambs, timing of shearing and crutching, effective natural control of scouring (especially the control of intestinal worms), strategic application of natural treatments to prevent flystrike, and regular inspection of the flock especially daily during high risk periods.

72. Deer – de velvetting

Soil & Health opposes this proposal, as we believe that the de velvetting of deer should be prohibited. However if it is to go ahead we do not believe that farmers should undertake this procedure themselves, even if given veterinary approval. It should be made mandatory that only a vet or veterinary student under direct veterinarian supervision should undertake this procedure.

74. Horses – tail docking

Soil & Health supports the proposed regulation to prohibit tail docking of horses. We believe it is a cruel and unnecessary procedure. We support the proposed restrictions that tail docking only is performed for therapeutic purposes (i.e. in response to disease or injury), that a veterinarian or a veterinary student under the direct supervision of a veterinarian must perform it, and that pain relief must be used at the time of procedure.

80. Pigs – castration

Soil & Health supports this proposal in part. We propose that castration of pigs only be permitted at a young age of less than 6 months. Castration beyond 6 months of age should be banned. We support the proposed regulation that a veterinarian or a veterinary student under the direct supervision of a veterinarian must perform the procedure, and that pain relief must be used at the time of procedure.

81. Pigs – tail docking

Soil & Health opposes the regulation to allow for tail docking of pigs. We believe it is a cruel and unnecessary practice. The reason tail docking of pigs is performed is to reduce the incidence of tail biting. However tail biting is a result of keeping pigs in high-density stocking numbers and pigs become frustrated and distressed. Pigs are highly intelligent, inquisitive animals and need intellectual stimulation such as natural material to play with. Studies have shown that providing straw or other manipulable materials and keeping a lower density of pigs in a pen could largely prevent tail biting.

Conclusion

As set out above, Soil & Health supports the majority of the proposed regulations in the document in general, however we oppose a number of the proposed regulations as they either prevent animals from expressing normal patterns of behaviour, or they are cruel mutilation practices that cause harm and distress, thereby running contrary to the Animal Welfare Act. We believe that animals should not be kept in closed cages. Instead all animals should have unrestricted daily access to pasture. We therefore strongly oppose the use of colony cages for poultry and farrowing crates for pigs and believe they should be prohibited. In summary, while we commend the government for their efforts to tighten animal welfare regulation and create better enforcement with the Animal Welfare Act, we believe there is still much room for improving New Zealand's animal welfare standards to better meet the physiological and behavioural needs of animals.

Yours sincerely

Name: Mischa Davis

Position: Policy Advisor

The Soil & Health Association

PO Box 340002

Birkenhead

Auckland 0746

Phone: s 9(2)(a)

Email: advocacy@organicnz.org.nz

Website: www.organicnz.org.nz

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Proposed Animal Welfare Regulations – Care & Conduct and Surgical & Painful Procedures

Dairy Cattle Veterinarians (Special interest branch of New Zealand Veterinary Association.)

Neil MacPherson

s 9(2)(a)

We strongly support the introduction of animal welfare regulations as a means of identifying and enforcing required standards of animal welfare. This will provide an easy method of dealing with breaches in a way that is not too onerous on either the regulator or those who may breach standards. This should assist all people responsible for the care of animals to ensure that they are aware of societal expectations with regards animal welfare.

The Dairy Cattle Veterinarians executive has attended the public meetings at Palmerston North, Hamilton, Christchurch & Invercargill to discuss these regulations. Our comments are informed by the discussion that was had at these meeting in addition to our experience as dairy cattle veterinarians who attend dairy farms on a regular basis.

Responses to the Questions within Part A

Q1) These should come into force at the same time as the regulations rather than waiting until 2020 as there is little substantive change from what is currently in force or that would require significant changes to practice that would be logistically difficult to achieve within a short timeframe.

Q2) The penalty for non-compliance with a Compliance Notice should be more than is proposed (currently \$500), this should be a minimum of \$1,000 given that the person has already been informed that they are non-compliant with the Act and have been provided with time to rectify the situation yet remain non-compliant. The infringement fee for section 36(3) is appropriate.

Q3) No

Q4) No

Q5) No

Q6) N/A

Q7) No – other animal welfare issues should not be addressed through non-regulatory initiatives. The example of reducing the induction of premature calving in dairy cattle addressed a specific issue that is not commonly undertaken in most other farming countries. I was integrally involved with the process to reduce then eliminate induction of premature calving so can speak to this issue. This relied on cooperation between stakeholders which, although successful, took longer than anticipated to get to the point where inductions could only be carried out by special exemption. The process was never tested, for example if one of the stakeholders to the Memorandum of Understanding did not agree then it was not clear how the other parties have made progress. Also, the process of reducing the incidence of induction of premature calving had no legal prohibitions put

in place and we are aware of instances where the guidelines were not followed. In those instances, a farmer (presumably with oversight from a veterinarian) acted outside of the MoU and there was no real process to take action against them. Given that breaches of animal welfare can impact an entire industry and New Zealand's reputation for animal welfare we do not believe that it is reasonable to leave standard setting or the changing of expectations to non-regulatory initiatives.

Q8) The proposed regulations will change the way that some animal owners operate in that they will now need to provide a higher level of animal welfare. None of the changes will be particularly difficult to implement from a logistical point of view but may incur some extra cost e.g. requirement for provision of pain relief for all calf disbudding / dehorning. The costs are not anticipated to be prohibitive, for example the cost for local anaesthetic for each calf at disbudding is unlikely to exceed 50 cents per animal. There will be a need to increase the level of technical skill for administration of local anaesthetic and some of the regulations will also require a level of auditing to ensure that the desired outcomes are being achieved (i.e. that local anaesthetic is being administered correctly to provide pain relief). It is important to remember however, that the New Zealand economy relies heavily on agricultural exports so it is reasonable to act now to maintain New Zealand's reputation as a leader in animal welfare.

Q9) We have some concerns about determining whether an infringement is causing a low-level of harm or a moderate level of harm; also what constitutes a small number of animals. We believe it would be useful to have an infringement offence for the higher amount of at least \$1,000 where a larger number of animals is affected e.g. a group of 60 calves that have been disbudded without the use of pain relief. This maintains the intent of the regulations in expediently dealing with an offence and not needing to take a prosecution.

Q10) We are concerned that prosecutions will still only be taken in the most extreme cases of animal abuse or neglect. As above, our recommendation would be an infringement notice to a higher amount for cases where many animals are involved or where moderate harm has been caused – in these instances, the offender is likely to be a person who makes a significant amount of money from their animal operation and therefore the financial penalty needs to be a sufficient deterrent. People's interpretation of moderate harm may be affected by the fact that some of these procedures have been legal up till now e.g. disbudding/dehorning up to the age of 9 months without provision of pain relief.

Q11) Assuming that there is a reasonable education campaign which is supported by the animal industries then lack of knowledge of the new regulations should not be a defence against prosecution. Similarly intent or recklessness is difficult to prove and should not be included.

Q12) The defences listed in section 4.1.5 are reasonable.

Q13) The definition should be expanded to include protecting animal life.

Q14) This will be answered throughout the responses to Section B

Q15-17) We support the second approach whereby the codes of welfare are amended only where the regulations provide a higher standard as this would allow the codes of welfare to continue to come into play in prosecutions for Act offences.

Q18) There are already a number of fora which provide feedback to MPI including the Farm to Processor Animal Welfare Forum and NAWAC. Additionally, industry leaders meet with senior MPI officials and can lobby the Minister to provide feedback.

Responses to Specific Proposals (the Regulations in part B)

1. All animals electric prodders: We agree with this regulation in principle but believe that electric prodders should only be used in situations where the animal, other animals or people are at risk of injury and not as a routine method of encouraging animals to move. Exceptions to this would be for loading animals onto transport which is not a procedure that the animal would be familiar with and therefore the animal may be unlikely to move with other inducements and when loading a stunning pen. In the exceptions suggested there may well be a risk of injury to people if they were to get in with the animals. There would be few other situations on a farm or in a circus where it is justified to use electric prodders compared to other means of encouraging animals to move. A rare example for use of an electric prodder would be as part of a veterinary clinical /neurological examination of a recumbent animal to test reflexes and/or encourage them to stand as remaining recumbent is likely to cause the animal's condition to worsen. We would suggest no more than three shocks or prods, if the animal has not responded as desired then further use of an electric prodder is not warranted.

A point that is raised from this regulation is around the use of animals in circuses. We do not believe that it is possible to meet the needs of animals other than commonly domesticated species such as dogs and horses within the physical constraints of a circus and that keeping exotic animals such as elephants, monkeys or big cats in a circus should be prohibited.

2. All animals – use of goads: This regulation should be expanded to include all of the head of the animal and not just the eyes, and that the penis/prepuce should also be included as an area where a goad must not be used. There is no situation in which it is justified to use a goad (including an electric prod) in any of these areas.

3. All animals – twisting an animal's tail: We are in full agreement with this but it needs to be clear in additional information that lifting an animal's tail (specifically with cattle) is a reasonable method of reducing the risk of a person being kicked (or at least being kicked with a lot of force) when having to treat the animal such as insertion of intramammary treatments or placing a leg rope to lift a hoof to investigate lameness. Again, the lifting of the tail needs to be straight and upwards to be effective. Tail lifting must not be used with any force as to cause more than temporary discomfort or to fracture the tail. Tail lifting does not involve any lateral twisting of the tail.

9. Dogs - secured on moving vehicles: fully agree. We also recommend that, in instances where the dog may be jumping on and off the vehicle because they are working and moving a mob of livestock on a public road, that the vehicle be restricted to travelling at no more than 20 km/hr if the dogs are not secured. If the dogs are actively working then there is no way that the vehicle should be travelling faster than that. This would ensure that dogs are properly secured for the trip home when

the livestock have been moved or that the vehicle is limited in speed on the return journey if the dogs are not secured.

13. Goats – tethering requirements: fully agree.

14. Horses – use of a whip, lead or any other object: fully agree, although this should be allowed in a situation where a person is at risk of injury e.g. when a horse is attempting to bite a person. We believe it would be reasonable for the person to respond (in a manner similar to which another horse would respond if attacked) by striking with their hand or lead rope at the time of the incident or immediately afterwards as self defence or as part of a training process. Striking the horse some short time after the event as punishment is not an effective training method to protect people from being bitten by the horse in the future.

15. Horses – injuries for tack: fully agree. Could it just be stated that equipment and tack (includes bridles and boots etc) not cause cuts, abrasions or swelling?

16. Horses and donkeys tethering – fully agree. I'm not sure if it is covered under any other animal welfare or safety law but horses and donkeys should not be tethered on the side of a public road during the hours of darkness as they are more likely to be frightened and injure themselves or become loose and cause an accident.

17-28. A variety of proposals: fully agree with all of these.

29. The use of fireworks at rodeos: fully agree. Further we believe that fireworks are distressing to many animals and their sale and use should be restricted to public displays and that they should not be able to be sold to or used by members of the public. Additionally, events at rodeos which are potentially risky or distressing to animals should be banned; such events include events such as roping where animals can be brought to a sudden stop and events where a rider launches from a horse to restrain a running cattle beast. Events where horses which are not used to being ridden e.g. bull and bronco (horse) riding should be banned as these animals experience fear and distress as part of the incentive to buck.

30. Exotic animals in circuses: as mentioned previously, we fully support the prohibition of using exotic animals in circuses as we do not believe it is possible to meet their behavioural needs. Domesticated species such as horses, goats and dogs can be provided with adequate space for grazing as they are domesticated and can easily be restrained within appropriate spaces.

31. Cattle-Milk stimulation – fully support. Yes it occurs very occasionally usually by older farmers.

32. Cattle and Sheep- Vehicular traction in calving or lambing.

33. Ingrown horns: goats should also be included in this proposal, fully support.

34: Stock transport: include horses in this proposal, fully support.

35. Stock transport – Animals with ingrown horns fully support

36. Stock transport – Animals with bleeding horns or antlers fully support

37. Stock transport – Animals with long horns or antlers fully support

38: Stock transport-Lame cattle, deer, pigs and goats. We fully support the proposal. The present NZVA 2012 Fitness for Livestock for Transport (for slaughter) Veterinary Declaration uses the Dairy NZ lameness scoring system. This allows 0 & 1 score animals to be transported. Score 2 animals may be certified fit for transport by a veterinarian with specific instructions within the certificate. Score 3 is NOT fit for transport.

We would support the continuation of this process backed up by an infringement offence.

39: Stock transport- Animals that cannot bear weight evenly due to injury. We are not sure why this needs to be included as it seems to be covered by proposal 38. If the animal has a subtle injury so that it is not bearing weight evenly but would be classified as lameness score 1 (from proposal 38) then that should be fit for transport. If the degree of lameness is more than 1 then the criteria from proposal 38 should be sufficient. There should not be a distinction whether the lameness is due to injury or disease.

40. Transport of pregnant animals: while we support this proposal in principle we believe it would be difficult to ascertain whether the person in charge of the animal would have known it was likely to give birth during transport or within 24 hours. If the evidence is that the animal did give birth then this could have been obvious to the person responsible or might not have been – for example if the animals aborts the fetus. We think that further consideration needs to be given as to how this could be monitored and how it would be decided if the regulation has been breached or not.

41. Stock Transport- Animals with injured or diseased udders: fully support.

42. Stock Transport- Cattle or sheep with cancer eye: fully support

Young calf management regulatory proposals

We fully support all of these proposals but believe that these need to be applied to all young calves and not just calves derived from the dairy industry which are being transported to slaughter. Although calves which have been separated from their mothers (generally in the dairy industry) and have been sold for rearing into the beef industry are generally of higher monetary value and are more likely to be well cared for, the regulations should still apply to them as they can be transported long distances.

Another situation that should be considered is where a farmer has multiple properties or a nearby run-off property and might be moving calves greater distances for rearing e.g. to another property with calf-rearing facilities. If the calf is younger than 4 days old, then these calves should not be transported a distance greater than 5 km and the requirements for shelter during transport must also be met.

43. Young Calves-Loading and unloading facilities: fully support although this should be made clear that this is for when loading and unloading calves at a height of a normal livestock truck and not when putting calves on a low trailer for transport to the barn from the paddock or between properties on a small scale. It is mainly when the calves need to be lifted higher that there is a risk of

rough handling. It is also acknowledged that very young calves may not move as desired when encouraged to do so and they may need pushing to get them to move along a ramp or onto a truck and that they may not completely move by their own action as would be expected of an older cattle beast.

44. Young Calves shelter on farm: Fully support this and acknowledge that this requirement only applies to young calves that are separated from their mother.

45. Fitness for Transport-Age: this wording makes it more likely that calves will be at least 4 days old rather than possibly being in their fourth day since birth. Calves need to be healthy and strong and their feeding regime up till that point will be an important component of that. For example, if a calf is separated from its mother at 2 days of age, it might take a further 2 days for it to become used to being fed in the calf shed and so might not have received adequate feed in the few days prior to transport. It should be stated that calves should have been separated from their mother for 4 days before being allowed to be transported as that is more likely to ensure the required outcomes. It would be very uncommon for a calf to remain with its mother for more than 1-2 days so this should not be unreasonable to comply with.

46. Fitness for transport-Physical Characteristics fully support.

47. Young Calves-Maximum time off feed fully support

Regarding feeding calves at the lairage it would be difficult to ensure that all calves in the group were adequately fed and there may not be experienced staff, feed or equipment at the slaughter premises or transit facility.

48. Eight hour maximum duration of transport fully support. Reducing transport time will improve calf welfare. Hypoglycaemia has been shown to worsen in calves with a longer journey time. The mortality rate also increases with the distance of transportation. Good planning and meat companies working together would reduce the average calf transportation time.

49. Young calves blunt force trauma: support although there may occasionally be emergency situations where the calf should be killed expediently and it is not reasonable to delay humane euthanasia until a firearm or captive bolt can be accessed.

50. Young calves transport across the Cook Strait prohibited: fully support. Transporting young calves across Cook Strait for slaughter is completely unnecessary. We would also support the prohibition of transporting cull cows/ewes across the Cook Strait unless that would be their closest slaughter premises by transport time.

Surgical and Painful Procedures

51. Hot branding: fully support

52. All animals – Embryo collection via exteriorised uterus. We do not support that this may be carried out by any person. Embryo collection in sheep requires full general anaesthesia and

exteriorisation of the uterus from the abdominal cavity. We would suggest this should be "performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian." Pain relief must be used at the time of the procedure.

53. Laparoscopic AI. Fully support as long as it can be guaranteed that the person carrying out the procedure can safely and correctly use the method of pain relief that has been provided (local or general anaesthetic). Local anaesthetic can only be provided by a veterinarian under VOI and so the veterinarian must satisfy themselves that the operator is using the RVM correctly. This must involve a training and audit programme as is currently used for lay operators and devehetting stags.

54. Liver biopsy: fully support.

55. All animals-Dental work: This should clarify that the instrument ~~needs~~ to be designed for the purpose of dentistry but many of these are also designed to attach to a standard power pack for power tools which may not be specifically designed for veterinary uses. Should include (here or elsewhere) that pain relief must be provided if the procedure is likely to be painful e.g. extraction of teeth rather than just rasping of a horse's teeth.

63 Cattle-Teats: Fully support.

64 Cattle – Claw removal: Fully support

65 Cattle –Teat occlusion: Fully support

66: Cattle – Tail docking: Fully support

67: Castration and shortening of the scrotum: It is not recommended to use conventional rubber rings on cattle over the age of 3 months as, by this age, the tissue is likely to have become too large and developed for the method to be effective and it is not uncommon for the procedure to be ineffective and for the tissue that is occluded by the rubber ring to become swollen and infected. This then requires a difficult and costly surgical procedure by a veterinarian to correct. In the meantime, the animal will have suffered unreasonable pain and possibly die.



This proposal should cover animals up to the age of 3 months if it is to be undertaken by any person. Once the animal is more than 3 months old, it must be undertaken by a veterinarian or supervised veterinary student and pain relief must be used.

68. Cattle, sheep, & goats – Disbudding Fully support This is a huge improvement to make pain relief required at all ages. There needs to be a comprehensive training programme for individuals to perform the procedure correctly and safely and to ensure that the local anaesthetic is placed correctly and that sufficient time elapses to ensure that pain relief is provided. Hot iron or gas cautery disbudding is the most effective means of disbudding to ensure that the horn bud is removed or destroyed. Caustic pastes should be prohibited as they act slowly, are often ineffective and can cause injury to other parts of the body if the paste is transferred from another animal. Disbudding goats is a much more significant procedure and should only be allowed to be performed by a veterinarian or a supervised veterinary student and it is recommended that general anaesthetic be used (alfaxalone is recommended).

69. Cattle, sheep, & goats – Dehorning Fully support.

70. Sheep tail docking: tail docking in sheep should be carried out as early as possible. Under commercial farming systems this is usually done in the first few weeks of life. The smaller the lamb when it is done the better. The age that this can be carried out without pain relief should be no more than 3 months old (which would align for my suggested timeframe for castration in cattle and sheep). This would not be a significant change to current farming practice. The development of rubber rings impregnated with local anaesthetic or the application of a topical local anaesthetic that would improve animal welfare should be vigorously pursued. If the sheep is older than 3 months of age, this procedure should only be performed by a veterinarian or supervised veterinary student and pain relief should be compulsory. Given that veterinarians have a responsibility for animal welfare under the Veterinarians' Act, any of these significant surgical procedures would be performed using pain relief if undertaken by a veterinarian. Sheep are the only domesticated species where it is reasonable to remove part of the tail as a prophylactic measure due to the risk of flystrike.

71. Sheep- Mulesing: fully support prohibition as this procedure is not warranted in NZ.

72 – 78. Deer and horses: fully support all proposals due to the risk of poor animal welfare outcomes if this level of veterinary oversight or involvement is not adhered to.

79. Camelid castration: fully support that castration can only be performed by a veterinarian or veterinary student. We do not have the background to comment on whether the proposed age limits are appropriate or not.

Thank you for the development of these regulations and the opportunity to comment. It is very likely that you will receive many submissions from interested parties who have historically been able to conduct some of these procedures themselves and without the provision of pain relief. We ask that submissions be considered on their scientific merit and that the submitter is knowledgeable in the area and do not have a vested interest in maintaining the status quo rather than improving animal welfare. It needs to be recognised that all animals are capable of feeling pain as well as distress and fear – even neonates. Therefore, any significant surgical procedure needs to be justified on the grounds of human or animal welfare or safety for it to be considered reasonable in any circumstance to be carried out routinely as opposed to when it is in the best interests of an individual animal e.g. tail docking following a significant injury to the tail. If it is reasonable for a procedure to be

performed routinely e.g. disbudding/dehorning, castration then pain relief should be provided if it is feasible to do so.

Yours sincerely,

Society of Dairy Cattle Veterinarians
Special Interest Branch of the New Zealand Veterinary
Association.

E s 9(2)(a) | W dcv.nzva.org.nz



From: karen.am <[REDACTED]>
Sent: Saturday, 14 May 2016 8:17 a.m.
To: Animal Welfare Submissions
Subject: END FACTORY FARMING NZ

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. This is not entertainment and too many animals suffer unnecessarily.

The treatment of bobby cows, and separating them so young from their mothers is one of the most shocking things I have seen happening in NZ, but also the treatment of pigs and chickens needs improved standards as they are still not good enough and mean that they have to suffer and live in substandard conditions. No animal needs to be treated in such a heartless way, they are not just a piece of meat and deserve respect and care and to be able to live their lives in decent clean, caring conditions where they can move around freely.

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.

Thanks for listening!

Karen McDonnell

JA & JM Leigh

s 9(2)(a)

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

12th May 2016

To Whom It May Concern,

Re: Submission on Animal Welfare Regulations

I would like to make a submission as a dairy farmer on the proposed Animal Welfare Regulations. My husband and I milk 200 dairy cows, supplying Fonterra, we also have a large scale calf rearing unit (Top-Notch Calves) where we rear approximately 5,000 calves each spring.

I would like to make submissions on the following points:

1. Electric Prodders –
I agree that they should only be used on cattle over 100kg.
2. All Animals Use of goads –
I agree with the proposals
3. All Animals Twisting an Animal's tail –
This is commonly used to encourage a cow to walk up and put her head in the head bail, for example when retagging, or performing a veterinary examination on the head of a cow etc. We need to be able to retain this as a method of getting a quiet cow to move forward. I can see difficulty in defining what is causing pain and what is not, if this is brought into regulation. Perhaps it should be worded "Prohibit twisting of the tail of an animal in a manner that causes severe pain".
4. Cattle Milk Stimulation –
I agree that we should prohibit insertion of water or air. Farmers should use oxytocin to stimulate milk let down, and should have some on hand at their farm for when this is needed.
5. Vehicular traction in calving –
I agree that this should be prohibited.
6. Ingrown Horns, Stock transport cuts and abrasions and ingrown horns –
I agree with these proposals.
7. Stock Transport – Animals with bleeding horns or antlers –
I agree that these should not be transported, however sometimes an animal can damage a horn during transport, so this must be taken into account. The driver can verify that it was not bleeding on pickup I assume.

8. Stock Transport – Pregnant Animals –
I agree that stock should not be transported to slaughter if they give birth within 24 hours, however this is sometimes difficult to determine by the farmer, and even with the best endeavours a cow can literally spring up overnight and calve. So there will be some occasions when this occurs even though the farmer has made every best effort to avoid this.
9. I agree with 41 and 42.
10. Young Calves – Loading and Unloading Facilities –
I agree with this and propose that there is a 24 month lead in period to allow farmers time to plan a suitable solution on their farm, raise the funds to build it and to complete construction.
11. Young Calves - shelter –
I agree with your thoughts on this, plus I think young calves need to have shelter at saleyards too. I have seen young calves out in the pouring rain at Frankton saleyards. This is unacceptable for such a baby animal from an animal welfare perspective and affects their health for the calf rearer who buys them too.
12. Young Calves – Fitness for transport Age –
I believe calves should be at least 4 days of age before transport to slaughter. This is an accepted norm in the dairy industry. I think this should be days of separation from the mother. The age should not be recorded as this would be onerous on the farmer, however it would be quite simple to determine when visiting a farm, as farmers should have systems in place to ensure calves are four days old before transport to slaughter. Some farmers mark calves with a different colour, others have different pens etc. I am sure a system can be verified or not by a simple discussion. This should be brought in immediately.
13. Young Calves – Fitness for transport, physical characteristics –
I agree with these, as they are already accepted minimum standards within the dairy industry.
14. Young Calves – Maximum time off feed –
I agree with this. I also think farmers should feed within 4 hours of transport and that this should be a minimum standard.
There does need to be better communication between transport firms and farmers in regards to pickup times and also between processor and farmer if there are calves not acceptable for processing. Technology has been greatly improved in the last few years and needs to be utilised by the meat industry to communicate with farmers.
15. Young Calves – Blunt Force Trauma –
I think this should read “Prohibit the use of blunt force trauma for killing calves **except in an emergency**”. As there will be some cases where a farmer will have some fencing gear on their motorbike and may need to use a hammer to kill a young calf for example if it is born in the back paddock a long way from where the gun or dead bolt gun is kept, and had something very badly wrong with it and it requires euthanizing immediately. This can be brought in immediately I think.
16. Young Calves – Transport across Cooks Straight prohibited –
I strongly agree with this.
17. Hot Branding –
I agree this should be prohibited.

18. Cattle – Teats –

I believe this should be allowed by any person up to the calf age of **12 weeks**, not the 6 weeks as suggested. The supernumerary teats are very small, really only skin and fatty type of tissue. Their removal causes little discomfort to the calf. We currently remove supernumerary teats at about 8 weeks of age in line with the second round of vaccinations. We have the calves in the head bail and remove the teats then, with sharp surgical scissors. It works very well. There is no bleeding and most calves don't even flinch. As the calf gets over 12 weeks the supernumerary teats do grow and become larger, so over this age I would agree that pain relief must be used.

19. Cattle Teat Occlusion –

I agree with this.

20. Cattle Tail Docking –

I agree with this.

21. Cattle – Disbudding –

I would like to support pain relief being used for disbudding, however it must be able to be accessed by farmers and contractors from the vets and at a reasonable price. Works needs to go into this area to ensure easy access of the local anaesthetic. A lead in time needs to be allowed for this to occur, perhaps this regulation shouldn't come in until 2020, to allow for this and also to allow time for people to consider practically how they are going to disbud with anaesthetic.

If you would like to discuss any of the points above, feel free to give me a ring s 9(2)(a)

[REDACTED], or e-mail me at s 9(2)(a)

Yours faithfully

Joanne Leigh

Submission on
“Proposed animal welfare regulations – care and conduct and
surgical and painful procedures”
and
“Proposed regulations on the transport of live animals from
New Zealand

Dr Michael Morris

Visiting Professor in Environmental Science, China Agricultural University, Beijing

New Zealand address: s 9(2)(a)

I welcome the opportunity to have my say on both proposals for promulgating regulations so they provide greater protection to animals.

I am writing this submission as an expert in animal welfare, and human animal studies. I have a number of peer reviewed publications and conference presentations on the science, ethics and politics surrounding animal welfare legislation (listed at the end of the submission). In addition, I have been approached to submit a book chapter for Rowman and Littlefield on the regulations of zoos and aquaria in New Zealand.

I have followed the progress of the current changes to the Animal Welfare Act. I submitted on the “Animals matter” discussion document and on the Animal Welfare Amendment Bill 2013, both on my own behalf and on behalf of Speak Up for Animals. Over the past 13 years I have assisted SAFE in their submissions.

Many of the points I make have come from research I have conducted over the last 13 years on the New Zealand situation.

Although I am a member of SAFE, and support many animal rights groups, the views expressed are my own, and do not necessarily represent the views of SAFE or any other group. They are however scientifically and ethically informed, and based on sound, peer reviewed research. I therefore expect them to be taken seriously and treated with respect.

There are many parts of the new Act that I agree with, and many parts where I consider it does not go far enough, and I have discussed these at length below. I have however restricted specific recommendations to regulations or to the process by which the regulations are made. I realise that this is not the forum to relitigate points in the principal Act that I have already made in previous submissions.

The discussion document is quite comprehensive and goes through a lot of detail. I am concerned with the lack of consultation time allowed for such an important and comprehensive document. Industry groups have no shortage of money to pay staff so they can turn in submissions at short notice. Grass roots groups, individuals with full time jobs and other interested parties have less time available, and their participation should not be disadvantaged in this way.

There should be sufficient time available for comprehensive and well considered submissions to be made by all interested parties, not just well-funded industry groups.

1. Official Information Act disclosure

I have no objection to any part of my submission being discoverable under the Official Information Act. Quite the contrary; I welcome its dissemination to as wide an audience as possible, in order to facilitate discussion and education about animal welfare.

2. Introductory remarks – the Animal Welfare Amendment Act 2015

The Animal Welfare Amendment Act introduces a number of changes that further the protection of animals. This is quite appropriate given the way that attitudes and understanding of animals have changed since 2000 when the Act was first enacted. Since that time, the public has demanded change in the way that animals are farmed, and there has been a huge backlash against inhumane practices in the pork and dairy industries.

In addition, even though the latest FAO report predicts that demand for animal products will keep rising, there are indications that it will plateau in the near future and then start to decline. The market for meat in India has never taken off for example, and it is likely to become saturated in China¹.

The recent past has seen a number of successful start ups such as Hampton Creek, which specialise in vegan formulations of non-vegan products, and a great deal of investment has been put into enterprises such as plant based milk and meat made from cell culture. Partly this is in response to animal welfare concerns, but also because it is becoming more apparent that meat-based lifestyles are environmentally less sustainable²

Since New Zealand's economy is based on animal products, industries need to take heed of these trends and move away from animal-based products. Wise industries keep their fingers on the pulse of consumer preference, and wise governments assist them in this.

Animal products will not disappear overnight, but the trend is likely to be downwards, and consumers will be looking at value added products, which will include better welfare outcomes. The future trend will be towards lower consumption of better quality products.

In this regard it is worth noting that although the discussion document boasts about New Zealand's stellar animal welfare record as reported by World Animal Protection, the indicators used for this survey are legal instruments used in each country. This gives an indication of the general attitude of the public towards animal abuse, but does not necessarily correlate with better treatment of animals. Laws have to be enforced and interpreted through case law, and in many ways, the regulatory apparatus has failed animals at this level³.

In fact there is a negative correlation between the rating given by World Animal Protection and the number of animals consumed or vivisected in each country. New Zealand has a high level of animal consumption and vivisection per person⁴. There is certainly room for

¹ Nikos Alexandratos and Jelle Bruinsma (2012) *World agriculture towards 2030/2050: the 2012 revision*. ESA working paper, 12-03. FAO Agricultural Economics Development Division.

² ☐ Karl-Heinz Erb, Christian Lauk, Thomas Kastner, Andreas Mayer, Michaela C. Theurl & Helmut Haberl (2015) Exploring the biophysical option space for feeding the world without deforestation. *Nature Communications* 7. doi:10.1038/ncomms11382.

³ Morris 2011

⁴ "Towards an animal cruelty index" Research presently being conducted by the author, with funding from Kings College London

improvement, not complacency, when it comes to the treatment of animals in New Zealand.

3. Improvements to the treatment of animals

That said, the consultation process that led to the Animal Welfare Amendment Act 2015 has ushered in some positive changes to the way animal are treated.

In particular, I commend changes to Part 6, 'Use of Animals in research, testing and teaching.' It is good to know that Animal Ethics Committees are now required to take into account manipulations that may cause future suffering, even when no suffering is apparent at the time of the manipulation.

I also support the provision that animals that are killed but not otherwise manipulated by counted in statistics, though it is disappointing Animals Ethics Committees do not have to consider this in their cost benefit analysis. Nevertheless it will allow researchers like myself to have access to more accurate data on just how many animals are killed each year.

The requirement that Animal Ethics Committees take into account the suitability of using non-sentient or living alternatives is another improvement. This consideration has been sadly lacking in many recent decisions⁵.

There are other changes which appear minor, but which nevertheless show an increasing awareness that animals are sentient beings in their own right and nobody should be allowed to simply do what they like to them. The most far reaching of these would be the title, which formally recognises this for the first time.

Anyone setting regulations or otherwise acting as a regulator or enforcer under this Act will need to recognise and provide for this.

In any official procedure giving directions on drafting regulations it should be stated that all regulations must recognise and provide for animal sentence as described in the principal Act.
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Other improvements are the protection for wild animals (section 30A-E), something else that has been lacking up to now⁶. However, allowing killing in safari parks (30C) and the defence of "generally accepted practice" does water these provisions down.

The ban on cosmetic testing is another positive change. These changes are largely cosmetic themselves since this type of testing has not to my knowledge gone on in New Zealand. Nevertheless, it does future proof the Act, as well as sending a strong message.

It is also pleasing that inspectors have both more powers and more accountability, and that in cases where an offender is considered unfit to stand trial, the animal's wellbeing is still considered important enough for confiscation to be an option. I am also pleased that the courts may also consider the previous history of an offender when making a decision to confiscate an animal.

Other small changes that may nevertheless have larger effects, are the re-emphasis that

⁵ Bourke and Morris 2006, Morris 2004

⁶ Thiriet, D. (2013) Out of Eden: Wild Animals and the Law. In: Sankoff, P., White, S. Black, C. (Eds). *Animal Law in Australasia, second edition*. Federation Press.

animals must receive both adequate food and water(4(a) 4(ab)), as well as removing the excuse of practicality in sections 9(2)(b) and 11(1).

4. Retrograde steps

Given that practicality is not an excuse in the general provisions of the Act, it is disturbing to see that it has been given disproportionate status in the amendments to Part 5 of the Act, concerning Codes of Welfare.

The previous version of the Act allowed exceptions to the general provisions that animals should have a right to the Five Freedoms only under "exceptional circumstances". It is worth referring to the report by the select committee debating the original Animal Welfare Bill in 1999. This group of cross party representatives made it clear that the "exceptional circumstances" clause should apply to circumstances that were genuinely exceptional. It cannot be used as a general opt out clause to cover industry short sightedness, intransigence or greed⁷.

It is true that the "exceptional circumstances" provision has been used far too often simply to bypass the main requirements of the Animal Welfare Act. Minister Jim Sutton for example defended the use of the "exceptional circumstances" clause in the Layer Hen Code of Welfare because it has been used only rarely in other codes of welfare, a totally ludicrous and illogical interpretation.⁸

Some will argue therefore that adding the provisions to take economics and practicality into account when making regulations that will replace Codes of Welfare, is simply making *de jure* what was already *de facto*.

However, if a regulation does not give effect to a principal Act then it is always subject to legal challenge, and this may provide some protection to the animals. It certainly allows for dialogue and consultation, and this in itself helps raise awareness.

The Code of Welfare for Layer Hens has already been subject to one legal challenge to the Regulations Review Committee in 2005, and the Committee upheld the complaint. Although the government of the day took the almost unprecedented step of ignoring the recommendations of the Committee, their decision will no doubt be taken into account during the current legal challenge initiated by SAFE.

Allowing regulations to make *de jure* what is only *de facto* is therefore a retrograde step. Allowing religious sensibilities to override animal welfare is also outside the scope of an Act which has a stated purpose of preventing the ill treatment of animals, especially given the new amendment acknowledging animal sentience.

Allowing religious exemptions to protection of the vulnerable is no different to exempting religious stoning from the Crimes Act. Religious practices evolve and change over time. Certain practices that were commonplace among Christians not that long ago, such as slavery and burning at the stake, are now unheard of. In a similar fashion, religious freedom must not be used as an excuse to continue practices that cause animal suffering and which the majority find objectionable.

⁷Animal Welfare Bill (no. 2) as reported from the Primary Production Committee. Appendix to the journals of the House of Representatives New Zealand 1996-1999 (Vol. LXVI, p. 663-683). Discussed by Morris 2011

⁸ Letter, Jim Sutton to Regulations Review Committee, 2005. Worth, R. (2006) *Final report on complaint about Animal Welfare (Layer Hens) Code of Welfare 2005*. Report on the Regulations Review Committee. Wellington, House of Representatives

The retrograde steps of allowing religion and economy to interfere with what should be regulations based on animal welfare can be mitigated during the stage of regulation drafting. Although the new amendments state that the minister 'may' take religion and economy into account, they in no way obligate the minister to do so.

I therefore propose the following, for all regulations

When drafting regulations religion and economy must not be used as a reason to allow practices that contribute to animal suffering. Instead all those with powers under the Animal Welfare Act and associated delegated legislation must recognise and provide for the sentience of animals as their first priority.

5. Non-regulatory mechanisms

Question 7 asks whether there is a place for non-regulatory mechanisms such as industry guidelines.

I have serious concerns with any legislation protecting animals that passes on any leadership responsibilities to industry. Industry should be regarded as one of the stakeholders, with as much right to have their views listened to as any other stakeholder, but nothing more. One of the issues with the regulatory system as it stands, is that industry groups have had disproportionate power and influence. Some of the ways that the industry have used this power to hold back improvements in the way animals are treated are as follows

- The Egg Producers Federation (EPF) claimed they "owned" the Code of Welfare for Layer Hens, and threatened MAF with court action if they attempted to change it. This was in spite of their public press releases stating the code was produced in consultation with all stakeholders⁹
- EPF used a mixture of threats and coercion on (then) Minister of Agriculture Jim Anderton to persuade him not to adopt the findings of the Regulations Review Committee that the Code of Welfare for Layer Hens was unlawful¹⁰.
- EPF lobbied extensively to keep battery cages, spending NZD500,000 on the campaign, in spite of their public announcements stating their support for all production methods¹¹
- The Poultry Industry Association of New Zealand (PIANZ) have sidelined legitimate opposition from groups such as the SPCA, and have succeeded in having maximum allowable stocking density based not on scientific findings but on industry standards¹².
- NAWAC is unbalanced in favour of individuals with industry affiliations¹³.
- NAWAC uncritically accepts statements from the industry with dubious scientific validity, and even reports whose very existence is in doubt, while ignoring more rigorous studies by truly independent scientists such as those on the European Scientific Committee for Animal Health and Welfare and its predecessors¹⁴
- NAWAC ignores any scientific reports or any testimony that does not fit with its own rigid and limited idea of science¹⁵.

⁹Morris (2006, 2011)

¹⁰Morris (2009, 2012)

¹¹Ibid

¹²Morris (2009).

¹³MacLennan, C. (2009, August) The business of cruelty. *Wereworlf* 3.

¹⁴Morris (2006, 2009, 2011, 2012)

¹⁵Morris and Beatson (2011)

- The Pork Industry were caught with their pants down when Colin Kay, an executive on their board, was caught keeping pigs in illegal sow crates that were narrower than the 60cm allowed by law. The Pork Board used their influence with government to get the regulations retrospectively changed to allow narrower crates¹⁶

Giving the animal industries any statutory powers under the Animal Welfare Act is akin to giving statutory power to tobacco companies under the Smoke Free Environment Act, to developers under the Resource Management Act, to corporate manufacturers under the Health and Safety in Employment Act, or to the Mongrel Mob under the Crimes Act.

So the short answer to question 7 is 'no'.

6. Proposed enforcement regime

I am in broad agreement with making some animal welfare offences infringements, so it will be easier to enforce them. This was the argument recently made by an animal rights lawyer in an academic journal¹⁷. I am also in favour of strict liability. I would however like to see provision for waiving fines in cases where neglect of an animal is due to ignorance and not malice.

For example, the decision for the SPCA to prosecute the guardian of a cat who obviously cared for her charge but did not recognise her need for required veterinary attention, I consider to be too punitive. It would have been more appropriate to require the guardian to attend some form of education on caring for companion animals.

7. Surgical and painful procedures

Given that animals are sentient, given that surgical and painful procedures are by their nature painful (the title gives us a clue here), and given that section 4 (c) of the Act prohibits "unreasonable or unnecessary pain or distress, surgical procedures should only be allowed under the following conditions.

1. There is a net gain to the animal. By this I mean that the surgery is a medical necessity to protect the health of the animal. It does not mean that it will be more convenient to the owner. The debarking of dogs, for example is never in the interests of the patient and should therefore be disallowed.
2. There is some other net gain to the welfare of animals or humans. In the case of desexing cats and dogs for example, this operation does restrict the normal behaviour of the animal, as well as affecting its identity as a male or female. This needs to be balanced against the effects that unwanted kittens and puppies can have on the welfare of these animals and on the wildlife.
3. If a procedure is to be allowed on the basis of the two criteria above then it must be performed under the direct supervision of a veterinarian. I am open to non-veterinarians performing some operations, but for this to be allowed, there must be a separate consultation with input from vets, vet nurses, vet educators and animal welfare agencies, to determine exactly what sort of training is to be required.

¹⁶Morris (2011, 2012).

¹⁷Duffield, D. (2013) The enforcement of animal welfare offences and the viability of an infringement regime as a strategy for reform. New Zealand Universities Law Review. December 2013

4. All procedures must be performed with adequate pain relief. Since there have been cases where post-operative pain has occurred after operations even by trained veterinarians¹⁸, adequate post-operative analgesia must also be used.

Principals 1-4 above must be incorporated in any guidelines to those responsible for drafting, promulgating or enforcing regulations concerning surgical and painful procedures.

Based on the principals above, I have the following proposals to make regarding the specific procedures in the discussion paper. For offences to companion animals or other animals kept for non-commercial purposes I propose the following.

Any fine can be waived for a first offence at the inspector's discretion if the inspector is convinced the offender was acting out of ignorance and not malice or carelessness. The inspector may require the offender to attend a course in lieu of a fine.

7.1. Electric prodders

These must be disallowed. It may appear reasonable to allow them where the safety of the handler is at risk, but worker safety would be better addressed through the Health and Safety in Employment Act or similar legislation. This already stipulates that a worker may refuse to perform tasks that put his or her safety at risk.

7.2. Goads

I agree with the restrictions as proposed.

7.3. Tail twisting

Tail twisting should be disallowed. The proposal to only disallow it if it causes pain would be hard to enforce. Who has the burden of proof to determine whether the twisting was painful, and what criteria would be used as evidence?

7.4. Pinch and prong collars

7.5. Injuries from collars or tethers

I agree with the restrictions as proposed.

7.6. Muzzling a dog

Dogs must also be able to drink. Muzzles must only be used where there is a genuine health and safety concern to the public. I.e., a dog must not be muzzled if he or she cannot bite anyone.

7.7. Dry and shaded shelter

I agree with the restrictions as proposed.

7.8. Dogs left in vehicles

¹⁸ Hewson CJ, Dohoo IR, Lemke KA (2006) Perioperative use of analgesics in dogs and cats by Canadian veterinarians in 2001. *Canadian Veterinary Journal* 47(4):352-9.

I agree with the restrictions as proposed. I would also like to see an amendment to relevant legislation that allows anyone to break into a vehicle to rescue an animal without fear of conviction, if they have made reasonable attempts to find the vehicle's owner and have been unsuccessful.

7.9. Dogs secured on moving vehicles

7.10. Drowning dogs and cats

7.11. Eels – insensible for desliming

7.12. Crabs, rock lobster and crayfish – insensible before being killed

I agree with the restrictions as proposed.

7.13. Goats – tethering requirements

Goats must not be tethered.

Orr (2008)¹⁹ lists the following welfare issues associated with goat tethering.

- They need a sturdy hut to protect them from bad weather and a bucket of fresh water at all times. All too often these are not provided.
- Roadside grass is usually dirty and poor quality so the goats don't get enough to eat.
- They are at risk of theft, and of attack by dogs.
- They risk being caught in or even strangled by their tether.
- On dry gravel roads they are blasted by dust every time a vehicle passes.

According to the draft *Code of welfare* for goats, they are usually tethered to "keep the area grazed and free of weeds". This is yet another reason to ban tethering. Goats are browsing animals, not grazers, and keeping them as cheap lawnmowers grazing close to the soil means they will be more susceptible to internal parasites²⁰.

The strongest reason why tethering should not be allowed is however because it is unlawful. The Animal Welfare Act states that animals should be able to "display normal patterns of behaviour". It is clear that a gregarious browsing animal, tied up alone and with little room to move, is not able to display the normal social or feeding behaviour of its species.

7.14. Horses – use of a whip, lead or other object

Such objects must not be used at all. Horses have thick skin so it is quite possible that some light applications of a whip will not hurt them, but again it is a question of how this can be proved.

7.15. Horses – injuries from equipment such as halter, head ropes and saddles

I agree with the restrictions as proposed

7.16. Horse and donkeys – tethering requirements.

Tethering should be prohibited. Most of the reasons applicable to goat tethering (7.13) apply.

¹⁹ Orr, M (2008) Angora Goat Welfare. *Lifestyle Block*, retrieved from <http://www.lifestyleblock.co.nz/index.php/lifestyle-file/article/788-angora-goat-welfare.html>, accessed May 2010.

²⁰ Harwood, D. (2006) *Goat Health and Welfare: a veterinary guide*. Crockwood Press, Ramsbury.

7.17.20. Layer hens

This does not relate to a surgical procedure but to a large-scale commercial operation. I have therefore discussed this in a separate section (section 8).

7.21-23. Llama and alpaca

I agree with the restrictions as proposed.

7.24-28. Pigs

This does not relate to a surgical procedure but to a large-scale commercial operation. I have therefore discussed this in a separate section (section 9).

7.29. Rodeos.

Rodeos in their present form, as entertainment spectacle where stressed animals are abused so that human participants can show off their macho, should be disallowed. There are two reasons for this.

Firstly, if animals are to be considered as sentient beings as stipulated in the title of the Act, then animals must not be laughed at or derided. In the past, circuses and zoos have put on performances that have demeaned animals, such as dressing lions in dunce caps, or holding chimpanzees' tea parties. Performances where the ringmaster towers over the big cats in the ring cracking a whip should also be avoided. In some of these cases the animal may not be suffering, or even aware of what is going on, but the image reinforces the idea of domination by humans over animals.

If we are serious about the moral status of animals as sentient beings, then their dignity has intrinsic value, and should not be compromised, even if the animal itself is not aware of what is happening.

A more serious concern with rodeos is that animals do suffer, and there have been recent incidences of animals having to be put down because of their suffering. Rodeos, by their very nature, are violent events. The RNZSPCA is vociferous in its condemnation of rodeos, describing how the use of electric prods, flank straps, spurs and ropes can result in "stress, torment and fear for the animals".

The New Zealand Rodeo Cowboy Association (NZRCA) argues that injuries from rodeos are uncommon, but an examination of their own statistics shows that they are not so rare that they can be easily dismissed. The NZRCA recorded 42 injuries in the 1999-2000 season. The particularly violent "sport" of calf roping, where calves are flung onto their backs after running full speed resulted in 4 injuries, including one so traumatic the calf had to be put down. The NZRCA only collect statistics on visible injuries; bruises, strains and the psychological torment of abject terror are not recorded.

7.30. Circuses

Exotic animals should not be used in circuses. The same arguments apply as for rodeos regarding using animals for spectacle. The case of Mila the elephant, who suffered severe mental stress to the extent she killed her keeper after spending several years in a circus, must bear out just how inhumane this practice is. As is the case for rodeos, there is no corresponding net benefit to society that would justify the inhumane use of animals in this way.

7.31-42. stock transport

I agree with all the restrictions as proposed.

7.43-50. Young calf proposals.

The dairy industry is one of the major export earners for New Zealand, and as practiced, dairying requires a large number of calves that are considered surplus to requirement and are disposed of. It is one of the more horrifying aspects of the industry, and one that leads to more suffering and death even than the beef industry. The recent exposure on television, together with the death threats made by farmers against activists on Facebook and other forums, point to this being a shameful industry.

Since there is evidence that milk production per cow can actually increase if the cow is allowed to share milk with the calf²¹, then my proposal is that the present system of separating the calves from the mother at birth be totally discontinued. In this case, a phase out period should be allowed so that the industry has time to conduct the necessary research and invest in the appropriate infrastructure. This should not be longer than 10 years, and should not be extended.

The present system of dairying whereby calves are separated from their mothers before weaning must be phased out within 10 years.

7.51. Hot branding

Agree with proposed restrictions

7.52. Embryo collection via exteriorised uterus

7.53. Laparoscopic artificial insemination

These operations are never in the interest of the animal, and therefore should be disallowed.

7.54. Liver biopsy.

This must only be performed where it is in the interests of the animal or of other animals, and only under conditions stipulated in principals 1-4 above.

7.55. Dental work

I agree with the proposed restrictions

7.56. Cat declawing.

This operation is never in the interests of the animal, and so should be disallowed. The definition of 'best interests of the animal' provided is misleading, since what it really means is in the best interests of selfish guardians, who would kill or mutilate a sentient being simply because their behaviour is inconvenient to them.

7.57. Companion animals – desexing.

As discussed above, this does harm the animal but provides a net benefit to other animals. I therefore agree with the proposal.

7.58. Freeze branding.

²¹ Webster, J. (1997) Animal Welfare: a cool eye towards Eden.

This is not in the interests of the animal and so should be disallowed. Microchipping is a less intrusive alternative means of identification.

7.59. Dog debarking.

As discussed for cat declawing (7.56) above, this is never in the interests of the animal, but only selfish or inept guardians. This operation should be disallowed.

7.60. Dogs - cropping of the ears

I agree with the restriction proposed.

7.61. Dogs – dew claws.

This should only be performed when it is genuinely in the best interests of the animal, described as 'therapeutic reasons' in the proposal.

7.62. Dogs – tail docking

I agree with the restrictions proposed.

The Cabinet paper accompanying this discussion document mentions a 'vocal' group of stakeholders who are likely to oppose this. To counter any arguments they may put forward, I should point out that puppy dog's tails have a nerve supply. Behavioural observations provide plenty of evidence that the procedure causes acute (short term) pain.

There is also evidence that tail docking in puppies (and in the young of other species) causes chronic (long term) pain. Dogs and other animals often develop nerve bundles called neuromata in the stumps. These have been associated with chronic "phantom limb" pain in human amputees. It is very likely that dogs are suffering in the same way. In fact, since pain inhibition pathways are less developed in young animals, it is likely that puppies feel both the acute and long term pain from mutilation more acutely than adult dogs.²²

7.63. Cattle – teats

Teats must not be removed, unless it is directly in the interests of the animal (ie for therapeutic reasons), in which case they must be removed under veterinary supervision and with adequate operative and post operative pain relief.

7.64. Cattle – claw removal.

7.65 Cattle – teat occlusion

I agree with the restrictions as proposed

6.66. Cattle – tail docking.

This appears to be performed largely for the convenience of the operator and not for the cow. As is the case for other mostly pointless amputations discussed above (eg tail docking of dogs and declawing of cats), this should be prohibited, except in the rare case where it is in the genuine interests of the animal (ie for 'therapeutic reasons'). In this case it must be performed under the supervision of a veterinarian, and with adequate operative and post-operative pain relief.

6.67. Castration and shortening of the scrotum

7.68. Disbudding

7.69. Dehorning

Both castration²³ and horn removal²⁴ cause both short term and chronic pain, even in

²² P.C. Bennet and E. Perini, "Tail docking in dogs: a review of the evidence", *Australian Veterinary Journal* 81 (2003), 208-218.

²³ Morris and Weaver 2003

younger animals, and these operations are not performed for the benefit of the animal ('therapeutic' benefit). If we are being consistent with proposed bans on companion animal amputations, this should therefore be banned.

Given that there is still general acceptance of using animals for food and that these operations are an integral part of this, I propose that at the very least, this operation must be performed under veterinary supervision with adequate operative and post-operative pain relief.

7.70. Sheep – tail docking

Tail docking in sheep causes short term and long term pain. It is performed to prevent fly strike, but there are other, less intrusive ways to prevent this. These include dagging and crutching, trapping flies, selective breeding of 'ethical' sheep with less hair in the breech region, and even vaccination²⁵.

In addition, Nigel French, now a scientist at Massey University has concluded that the effectiveness of tail docking in reducing fly strike is questionable.²⁶

For these reasons, this operation should be prohibited except for therapeutic reasons, in which case it must be performed under veterinary supervision, with adequate operative and post-operative pain relief.

7.71. Mulesing

I agree that a complete prohibition is necessary. Mulesing is extremely painful²⁷ and there are less intrusive ways to prevent fly strike, as discussed above.

7.72. Deer velvetting

This operation is performed, not in the interest of animals, and not even in the interests of consumers of the product. There is no evidence that deer velvet has any therapeutic effect at all²⁸, so selling this product causes harm to society as well as the deer, and therefore could even be in breach of the Fair Trading Act.

This operation is intrusive and harmful to animals and people, and therefore should be disallowed.

7.73-78. Operations on horses

I agree with the proposed restrictions for all the operations except castration. This latter operation is not only not therapeutic, it is not necessary for animal production. It should therefore be prohibited.

²⁴ McMeekan, C.M., Mellor, D.J., Stafford, K.J., Bruce, R.A., Ward, R.N. and Gregory, N.G. (1997) Effects of shallow scoop and deep scoop dehorning on plasma cortisol concentrations in calves. *New Zealand Veterinary Journal* 45, 72-74.

McMeekan, C.M., Mellor, D.J., Stafford, K.J., Bruce, R.A., Ward, R.N. (1998) Effects of local anaesthesia of 4 to 8 hours' duration on the acute cortisol response to scoop dehorning in calves. *Australian Veterinary Journal* 76, 281-285.

McMeekan, C.M., Stafford, K.J., Mellor, D.J., Bruce, R.A., Ward, R.N. and Gregory, N. (1999) Effects of a local anaesthetic and a non-steroidal anti-inflammatory analgesic on the behavioural responses of calves to dehorning. *New Zealand Veterinary Journal* 47, 92-96.

²⁵ Morris and Weaver 2000

²⁶ French, N., Wall, R., Cripps, P.J. and Morgan, K.L. (1994) Blowfly strike in England and Wales: the relationship between prevalence and farm and management factors. *Medical and Veterinary Entomology* 8, 51-56.

²⁷ Morris 2000

²⁸ Gilbey A; Perezgonzalez JD (2012) Health benefits of deer and elk velvet antler supplements: a systematic review of randomised controlled studies. *New Zealand Medical Journal* 125, 80-86.

7.79-80. Castration of pigs, llama and alpaca.

The same arguments apply to horse castration. Castration of pigs is largely performed to avoid boar taint, which is a trivial want. This operation should be prohibited.

7.81. Tail docking of pigs.

This is usually performed to prevent pigs from biting each others' tails. This occurs in situations where pigs are stressed, such as in crowded conditions²⁹. Since sow crate have now been banned, there is no need for this operation. Tail docking should only be performed for therapeutic reasons, when it must be performed under veterinary supervision, with adequate operative and post-operative pain relief.

7.82. Pinioning.

This is never performed for therapeutic purposes, but merely for the convenience of the birds' guardian. It should be prohibited.

7.83. Poultry dubbing.

This is a cosmetic operation and should be prohibited unless there is a genuine therapeutic reason to perform it. In this case it should be performed under veterinary supervision with adequate operative and post-operative pain relief.

7.84 Ostriches and emus – declawing.

I agree with the restriction proposed.

7.85. Rooster castration

Like pig, horse and alpaca castration, this is an unnecessary operation. It should be prohibited.

8. Layer hens

The questionable nature of hen cages has been discussed in the scientific literature since at least 1994 (qv).. In 1997, the European Commission phased out the use of cages, following a rigorous review by their Scientific Veterinary Committee. This review concluded that even though all systems of husbandry can have welfare problems, the issues with barn and free range systems are problems of management. In contrast placing hens in cages causes behavioural deprivation and osteoporosis, which is inherent in the system³⁰.

A more recent meta-analysis from the European Commission revealed that the mortality increase in non-cage systems caused by bullying and feather pecking have been exaggerated by the industry. Any mortality differences are slight and unlikely to be statistically significant³¹. Other studies have demonstrated the need to hens to display normal patterns of behaviour for their species, including dustbathing, perching, wing flapping and nesting³².

The industry have bowed to the inevitable and now support the phasing out of barren cages. The so called 'furnished cages' they are proposing to replace them with are however not much of an improvement. Interestingly, even (then) Minister of Agriculture Jim Sutton realised this, because when it suited him he used the inadequacy of the

²⁹ Weaver and Morris 2004.

³⁰ Morris 2006

³¹ Laywel (2006) Welfare implications of changes in production systems for laying hens.

³² Morris 2006

alternative system to defend using the status quo (using the two wrongs make a right argument favoured by politicians), in his reply to the 2005 submission to the Regulations Review Committee³³.

The States of California and Michigan recognise the inadequacy of furnished cages, and their phase out includes all cages. The Austrian Parliament unanimously voted for a similar phase out of all cage systems, including enriched cages on 27 May 2004. The government moved to include colony cages in the ban after the animal rights group VGT in Austria presented photographic evidence of dead hens and cramped conditions in these cages³⁴. Colony cages have also been banned in Germany since 2012.

A scientific analysis by the European Commission in 2005 expressed concern over the ability of colony cages to allow foraging or dustbathing.³⁵ The Laywel report³⁶ also concluded that small colony cages led to a higher mortality rate than other systems. The report recommended more research be performed on foraging and dust bathing behaviour.

Recent reviews³⁷ provide more recent evidence that colony cages are an inadequate substitute for conventional cages. Perching, nest building, wing flapping and dust bathing behaviours are all either inhibited, curtailed, or restricted. Perches for example are too low for roosting hens to feel comfortable in, and if the perching height is too low, roosting hens can be pecked at by hens on the ground. Nest boxes and areas for dust bathing are too crowded to allow any meaningful activity.

The colony cages only allow sham dust bathing, and this is not a substitute for the real thing. Sham dust bathing is at best a coping mechanism, and the question needs to be asked as to why the hens are kept in such conditions that they need to resort to such mechanisms. Dust bathing in real dust is not only a biological necessity to rid the hen of parasites, but it is a pleasurable activity conducted for its own sake³⁸. Sham dust bathing is no more a substitute for real dust, than masturbation is a substitute for a real sexual partner.

While leg strength is higher in colony cages than their conventional counterparts³⁹, hens still cannot fly or flap their wings, so the wing bones are still weak and prone to cage layer osteoporosis. Space restriction is still an issue, with some recent studies showing any space of less than 5000sq cm leads to constraints on behaviour.⁴⁰

The HSUS mentions the importance of "exploratory behaviour". It appears as if exploratory behaviour among hens is in the same category of enjoyable behaviour as dustbathing, since hens will continue to explore and peck their surroundings even when

³³ Letter, Jim Sutton to Regulations Review Committee, 2005. Worth, R. (2006) *Final report on complaint about Animal Welfare (Layer Hens) Code of Welfare 2005*. Report on the Regulations Review Committee. Wellington, House of Representatives.

³⁴ Balluck M (2009) The ban on battery hen farming in Austria. Presented at the National Animal Rights Conference, Auckland 28-29 March 2009.

³⁵ Animal Health and Welfare Committee (2005) Opinion of the scientific panel on Animal Health and Welfare on a request from the Commission related to the welfare aspects of various systems of keeping layer hens. *The EFSA journal* 197, 1-23.

³⁶ Op cit. note 31.

³⁷ Humane Society of the United States (2010) An HSUS report: welfare issues with furnished cages for egg-laying hens.

Lay DC, Fulton RM, Hester PY, Karcher DM, Kjaer JB, Mench JA, Mullens BA, Newberry RC, Nicol CJ, O'Sullivan NPO and Porter RE (2011) Emerging issues: social sustainability of egg production symposium: hen welfare in different housing systems. *Poultry Science* 90, 278-294.

³⁸ Widowski, TM and Duncan, IJH (2000) Working for a dutbath: are hens increasing pleasure rather than reducing suffering? *Applied Animal Behaviour Science* 68, 39-53.

³⁹ MTT Agrifood Research Finland (2010, November 1). Do furnished cages offer better welfare for hens?. *ScienceDaily*. Retrieved February 4, 2011, from <http://www.sciencedaily.com/releases/2010/11/101101083200.htm>

⁴⁰ HSUS (2010).

there is plenty of food available. Colony cages are too restrictive to allow this behaviour to take place⁴¹.

Colony cages are not common in New Zealand, though farmers are already familiar with non-cage systems. Advances in research since the EC put out their ban on conventional cages has meant that welfare issues in non-cage systems can be very largely corrected. There seems little point therefore in allowing the introduction of a new system that is questionable on welfare grounds.

8.2. Phase out periods

The industry has been aware for a great deal of time that battery cages are increasingly unacceptable to consumers and that there are scientific grounds for a ban. As early as 1994, the forerunner of NAWAC requested a review of battery cages following a New Zealand study on welfare in battery systems⁴². The European Scientific Veterinary Committee (SVC) put out their report in 1996. Largely as a result of the SVC findings, the EC moved to phase out battery cages in 1999. Since then, the states of California and Michigan have voted to phase out battery cages. After the European Commission directive in 1999, a great deal of research has been conducted in mitigating welfare issues associated with alternative systems, in preparation for the ban, which came into effect in 2012.

During the submission period for the operative *Code of Welfare* in 2004, the public overwhelmingly signalled their intentions for a ban on cages. Over 100,000 postcard submission demanding an end to battery cages were received during 2003. These were accompanied by substantive submissions from four animal welfare groups providing detailed scientific and legal evidence that continuing evidence that battery cages were unacceptable.

NAWAC did not end battery cages, but did send a strong signal in the operative *Code* that cages do not meet the requirements of the Animal Welfare Act. This was later backed up by the Regulations Review Committee⁴³.

The industry have therefore already had ample time to consider that warnings from public sensibilities, scientific bodies such as the European Scientific Veterinary Committee, animal welfare groups such as SAFE and the SPCA, and government agencies such as NAWAC and the Regulations Review Committee. It would be expected that the industry would start phasing out cages, conducting research into alternative systems, learning from European research already under way, and generally preparing themselves for a change in approach.

Instead the industry have been fighting rearguard actions to keep current systems in place. Prior to the Regulations Review Committee decision, the Egg Producers Federation used a mixture of threats, spurious science and intensive lobbying to maintain the status quo⁴⁴.

Lobbying has continued unabated. The industry firstly persuaded (then) Minister of Agriculture Jim Anderton to ignore a recommendation from the Regulations Review Committee, then, in 2009, they ensured that they could have the final say on approving research commissioned by MAF with taxpayer funding. It is worth examining this

⁴¹ HSUS (2010)

⁴² Animal Welfare Advisory Committee (1995) *1994 Annual Report*. Wellington, Ministry of Agriculture and Fisheries.

⁴³ Worth (2006)

⁴⁴ Morris 2006

commissioned report by Black and Christensen⁴⁵ in detail, as it highlights the way the industry misuse science in an effort to maximise their profits.

The Black and Christensen study examined the amount of "stress hormone" (cortisterone) in the faeces of hens that had been kept in battery cages and free range conditions. They also counted mortality and monitored fear responses. Mortality rates were higher in the free range farms, and they found no significant difference in cortisterone levels or fear response. There were however several flaws in the methodology, some of which were even identified by a non-scientist⁴⁶.

One difficulty was with the technique of faecal cortisterone measurement, which was measuring the wrong variable. Hens in battery cages are more likely to be suffering boredom than stress. The similarity in fear response merely shows that the hens in the battery cages had got used to their environment, but cannot have any bearing on whether the hens found it enjoyable. The researchers did not measure any indicators of boredom and frustration with barren conditions, such as willingness to work or the presence of stereotype behaviours. Nor was there any mention of investigations into cage layer osteoporosis. In other words, the two main welfare issues in cage systems, were quietly ignored.

The study also raises questions about how the farms in the study were selected. Battery farms were largely self-selected, in that the operators have to give permission for the researchers to come into the operation, and it is likely that only the better run ones would be likely to do this. The largest free range producer (FRENZS) was not approached, even though this producer has high welfare standards, including a requirement for low mortality rate and no beak trimming. The free range farms chosen for the study were run by battery farmers, who would be less experienced at free range husbandry and who would be likely to be thinking in the battery mindset.

I note that the amendment in the Act allows economics to be taken into account, but I consider that any hardship the industry may experience is irrelevant as they have already had ample time to adjust to changed consumer preferences, new scientific knowledge on welfare issues in cages, and latest research on ways to improve husbandry in alternative systems. The industry should certainly not be rewarded for their lack of preparedness by a long phase out time. A phase out of battery cages is likely to have positive economic outlooks for the country as a whole, including increase in employment, and more export opportunities due to our "clean green" image.

Cages (including colony cages) must be prohibited for animal welfare reasons. The phase out period should be not more than one egg cycle (two years).

9. Farrowing crates for pigs

Sow stalls are now illegal. It is a sad indictment of the so-called 'science-based' system of animal welfare regulation⁴⁷ that it took a campaign by a former Pork Board apologist whose Damascus-type conversion led to a huge expose of the inhumane ways pigs are

⁴⁵ Black, H. & Christensen, N. (2009) CO206/2006. *Comparative assessment of layer hen welfare in New Zealand – final report*. Assure Quality and Avivet, Wellington.

⁴⁶ Clifton J. (2009) Aporkalypse now. *New Zealand Listener* May 30-June 5 2009

⁴⁷ Mellor, D.J. and Bayvel, A.C.G. (2008) New Zealand's inclusive science-based system for setting animal welfare standards. *Applied Animal Behaviour Science* 113, 313-329.

treated in sow crates, to bring this change about⁴⁸. Previously, animal advocates had presented science-based arguments from peer-reviewed sources, only to be shouted down by industry advocates and their apologists in government⁴⁹.

Public pressure forced the industry to comply with the sow stall ban, but they are still maintaining that farrowing crates are necessary to protect piglets from being squashed.

This is not the case. As far back as 1997, the Scientific Veterinary Committee of the European Commission reported little difference in mortality between Sweden (where farrowing crates were banned), and Denmark (where they were not)⁵⁰. More recent surveys on piglet mortality based in Switzerland confirmed this.⁵¹ I know the industry were aware of these scientific peer-reviewed studies, because I sent the details to Sam McIvor at the Pork Board in 2012 in response to his request for more scientific information, following a letter I published in *Straight Furrow*.

An even more recent and more comprehensive study⁵² has confirmed these findings. As far as overall mortality of live weight piglets is concerned, there is no significant difference between farrowing crates, loose systems or outdoor systems. Crates have significantly fewer deaths from crushing, and outdoor systems significantly fewer deaths from other causes.

The authors consider that the effects on mortality are actually the same. They consider that in outdoor systems the sicker piglets would huddle closer to the mother, where they are at risk of being crushed. Those same piglets would not be able to do this in the farrowing crates, so they would die from their illness instead.

Outdoor systems have a lower proportion of stillborn piglets, so they are better overall in protecting piglet mortality. The authors suggest there is a slight possibility this finding has come about because it is harder to find the stillborn piglets in the outdoor systems before the mothers eat them, but they also point out that the observed litter sizes are the same for all systems, so if this is the case, the outdoor systems produce more piglets per litter, so productivity is still higher.

Given the welfare issues inherent in confining intelligent animals like pigs in barren conditions⁵³, especially in depriving them of the ability to build a nest⁵⁴, there are welfare reasons for a ban on farrowing crates, and no welfare benefits for allowing them to continue.

As is the case with the ban on cages for hens, it has been known since at least 1997 that farrowing crates have welfare issues, and the industry have had plenty of time to research alternative production methods and to replace ageing infrastructure as it depreciates. They have nobody but themselves to blame if they lose money from a ban. Economic

⁴⁸ Morris and Beatson (2011)

⁴⁹ Weaver and Morris (2004)

⁵⁰ SVC (Scientific Veterinary Committee) *The welfare of intensively kept pigs*, Report of the Scientific Veterinary Committee, European Commission (1997).

⁵¹ Weber R., Keil NM, Fehr M, Horat R. (2007) Piglet mortality on farms using farrowing systems with or without crates. *Animal Welfare* 16, 277-279. Weber R., Keil NM, Fehr M, Horat R. (2009) Factors affecting piglet mortality in loose farrowing systems on commercial farms. *Livestock Science* 124, 216-222.

⁵² Kilbride, A.L., Mendl, A., Statham, P., Held, S., Harris, M., Cooper, S., Green L.E. (2012) A cohort study of preweaning piglet mortality and farrowing accommodation on 112 commercial pig farms in England. *Preventative Veterinary Medicine* 104, 281-291.

⁵³ Weaver and Morris (2004)

⁵⁴ Jarvis et al. 2005, cited by Kilbride et al. 2012.

necessity should therefore not be used to justify a long phase out period.

Farrowing crates should be prohibited, and the phase out period should be less than one year.

10. Proposed regulations for the transport of live animals from New Zealand.

The amendments to the principal Act transfer the de facto ban on transport of animals for slaughter from an Order that could be rescinded at any time to an Act of Parliament. As such, this is an improvement. I also support all the extra requirements that the Director General must take into account before granting a certificate for export.

Animals Australia uncovered horrendous treatment of animals destined for consumption in many middle Eastern countries, so the requirement that the Director General 'may' take into account the welfare of the animals when they have reached the exporting country (section 43(2)) is an improvement.

New Zealand, in line with most civilised nations, does not allow suspected criminals to be extradited to places where they may face the death penalty, because this is against the law of our country. We recognise that our duty to protect our residents from harm extends beyond our own borders. Similarly, animals should not be extradited to places where they may face inhumane slaughter that is prohibited under New Zealand law. Our animal residents also need to be protected from harm.

I consider that this must be a part of any regulation around export of animals, whether for slaughter or any other reason. For this reason, I propose that the conditions described in 4.3.3 of the discussion document must go further, as below:

Animals must only be exported to countries that have equal or better legal protections for their welfare than New Zealand.

Appendix: Author's publications, including those cited in this submission. In reverse chronological order, then alphabetically.

Morris, M.C. and Murray, M. (2016) Regulation of zoos and aquaria in New Zealand. In: *Justice in the Ark: increasing legal equality for zoo animals* (Ed. J. Donahue). Rowman and Littlefield (in press).

Morris, M.C. (2013) Improved animal welfare is more related to income equality than it is to income. *Journal of Applied Animal Welfare Science* 6, 272-293.

Morris, M.C. (2012) *Factory Farming and Animal Liberation in New Zealand*. Smashwords (<https://www.smashwords.com/books/view/176657>)

Morris, M.C. (2011). The use of animals in New Zealand: regulation and practice. *Society and Animals* 19, 366-380.

Morris, M.C. and Beatson, P. (2011) Animal suffering in New Zealand: can science make a difference? *Kōtuitui: New Zealand Journal of Social Sciences online* 6, 124-132.

Morris, M.C. (2009): Middle Earth, Narnia, Hogwarts, and Animals: A Review of the Treatment of Nonhuman Animals and Other Sentient Beings in Christian-Based Fantasy Fiction. *Society and Animals* 17, 343-356.

Morris, M.C. (2009). The ethics and politics of animal welfare in New Zealand. Broiler chicken production as a case study. *Journal of Agricultural and Environmental Ethics* 22, 15-30.

Morris, M.C. (2007) How should Christians treat animals? *Stimulus* 15, 59-65.

Bourke, D. and Morris, M.C. (2006). Animal ethics committees and the protection of animals' interests. Presented at the New Zealand Bioethics Conference, Dunedin, 10-14 February.

Morris, M.C. (2006) The ethics and politics of the layer hen debate in New Zealand. *Journal of Agricultural and Environmental Ethics* 19, 495-514.

Morris, M. (2004). Animal experimentation in New Zealand: The three "Buts". In ANZCCART. Lifting the veil: Finding common ground. Wellington: ANZCCART. 137-144.

Weaver, S.A. and Morris, M.C. (2004). Science, pigs and politics: a New Zealand perspective on the banning of sow stalls. *Journal of Agricultural and Environmental Ethics* 17, 51-66.

Morris, M.C. (2003). Issues associated with research on sheep parasite control in New Zealand – a descriptive ethic. *Journal of Agricultural and Environmental Ethics* 16, 187-207.

Morris, M.C. and Thornhill, R.H. (2003). Animal rights and theories of origins: a plea for unity. *Worldviews: Environment, Culture, Religion* 7, 338-355.

Morris, M.C. and Weaver, S.A. (2003a). Minimising harm in agricultural animal experiments in New Zealand. *Journal of Agricultural and Environmental Ethics* 16, 421-437.

Morris, M.C. and Weaver, S.A. (2003b). Ethical issues associated with possum research and control in New Zealand. *Journal of Agricultural and Environmental Ethics* 16, 367-385.

Morris, M.C. (2001). Expert witness submission to the Royal Commission on Genetic Modification. Auckland, Feb. 15, 2001.

Morris, M.C. (2000). Ethical issues associated with sheep fly strike research, prevention and control. *Journal of Agricultural and Environmental Ethics* 13, 205-217

¹ M. Kiley-Worthington, *Animals in circuses and zoos: Chiron's world?*, (Basildon: Little Eco-farms Publishing, 1990).

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)

From: Kevin Brown <59(2)(a)>
Sent: Tuesday, 19 April 2016 7:15 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations'

to whom it may concern

if your regs include the tail docking of certain dog breeds or the stopping of dew claw removal on dogs especially working breeds then i suggest instead of bowing to the spca?safe element for once in your lives you actually talk to regular users of these breeds for the purpose they were intended.

you will only need to see a ripped out dew claw on a older working dog once to see the common sense and humaneness of doing this procedure while young

.the same with tail docking its done to save pain and injury on dogs working in rough and thorny cover.

as to bobby calves you,ve dragged your arses far to long on thier welfare while most dairy farmers are humane and animal lovers the fact that calves are a nuisance and a cost while bieng worth sweet fanny adams ensures that the often poorly paid and overworked labour [a lot of it immigrant]and less intune owners/managers dont give to tosses about them. i very much doubt you do or something would have been done after the hammer calf killing antics of ewan mcdonald and the instances of the same in ashburton that nathan guy seems to have ignored. but ofcourse you penalising farmers even bad ones is a pipe dream after all your to gutless to have a go at them after you,ve waltzed them down the garden path of bigger better monopoly production and landed them in a debt crisis due to your optomistic outlook lets hope jonnys begging trip to china gets them back in the dairy market harderor its not only dairy who,l be struggling for the next year or two.

From: Bill Leonard <9(2)(a)>
Sent: Tuesday, 19 April 2016 8:00 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

To Question 1:

The suffering of innocent animals is the paramount problem in this country and one that the M.P.I. claims to take seriously. Therefore, there is overwhelming reason to bring every ameliorative change to the Act forward to this year, to coincide with regulations.

To Question 2:

The minimum infringement fee for any aspect of the A.W.A should be set at \$1,000 and criminal conviction in order to fully grasp the attention of the violator and reduce the risk of re-offending.

To Question 3:

The Effectiveness and Efficiency criteria used to assess the proposals in Part B fall short of the pursuit of animal welfare in that much of what goes on in this country is not identified as a problem, and the expressed interest in delivering better standards than what the current minimums provide

"be the minimum necessary to ensure that the purpose of the Act will be met, be practical and economically viable"

cynically undermines animal welfare in favour of commerce.

Specific areas requiring consideration or change:

Traps: traps should be inspected every 3 hours.

Traps: steel-jaw leghold traps should be banned outright.

Confined-animal housing: M.P.I. should require comprehensive fire control (e.g., sprinklers) at . Penalise farmers a minimum of \$1,000 for each animal lost to fire / smoke inhalation and prohibit farmer from having animals in his/her care in future.

Vivisection: must be banned outright, as the success rate for cross-species extrapolation for drug efficacy is approximately 55%, which is roughly the same as rolling dice and expecting an even number. Most vivisection in New Zealand is done for the growth of animal agriculture and not for the benefit of the individual animal.

To Question 7:

Sub-regulatory measures are largely ineffectual, and there are few issues involving animals that aren't important enough for legislation. New Zealand must back up its claim to care for its animals.

To Question 8:

The proposed changes, if practiced *and enforced*, would bring our country minutely closer to the ideal. Therefore, the quality of my life would improve to that degree.

To Question 9:

See "To Question 2" above. It would be reasonable to vary the fine according to the likely amount of suffering inflicted.

To Question 10:

The wall separating "serious" harm from "minor" offences needs to come down, such that prosecution under criminal charges is available for real harm done, regardless of the victim's species, across the spectrum of offences.

To Question 11:

Because the victims are unable to fully communicate with us and are often the only witnesses, it is undesirable to add the element of intent to claim wrong-doing. It is M.P.I.'s responsibility, then, to broadly inform the farming community of the new regulations, to minimise violations occurring out of the ignorance thereof.

To Question 13:

Yes, and without exception.

To Question 14:

No, no lead-in period is desired, as this is a matter of the well-being of sentient creatures.

To Question 15:

Legislation should lead the codes, not the other way round. Codes are written by industry, which has conflicting interests (commodification vs welfare) and, therefore, codes have been overused and overstated.

To Question 16:

Ibid.

To Question 18:

The most easily identifiable "stakeholders" are animal farmers. Monitoring the implementation of **any** animal-welfare regulations/laws must be conducted by a government force of hundreds of inspectors with the power to access property without advance notice, serve infringement notices and fines on sight, remove animals from immediate (further) harm, and adequately defend themselves against such stakeholders if the confrontation becomes violent. Current enforcement is a joke, split up vaguely between the M.P.I., the R.N.Z.S.P C A. and the police (who seem indisposed toward investigating even many *human-on-human* transgressions at the moment). I don't need to tell you that under-enforcement makes **any** law virtually useless. I don't need to tell you that because under-enforcement has been the plan all along, I'm sure.

Changes required to Proposals

Electric prodders: inherently cruel; ban outright.

Dog injuries by collar or tether: expand to **all animals**.

Dog injuries/deprivation by muzzle: expand to **all animals**.

Dogs secured on moving vehicles: remove "working dogs" exception. No dog will be working whilst the vehicle is in motion on a public road.

Drowning: ensure that final language refers to all mammals (de-emphasising cats and dogs, except to give example)

Goats (tethering): ban outright. Tethering renders them helpless against predators, which is morally unsupportable. M.P.I. has responded insufficiently to public demand.

Horses - whips, leads: expand to **all animals**.

Horses - injuries from equipment: expand to **all animals**.

Layer hens: all phaseouts must be moved forward to 31 December 2016. Industry has long seen the sentiment of public opinion and has had ample time to go cageless. It is imperative that their unwillingness to change no longer impacts on these sentient animals. Eliminate proposal parts (b) and (c) and eliminate the assessment of colony cages as satisfying part (a), as they do **not** allow the birds such freedom.

Layer hens - housing: ban cages, allowing a grace period on colony cages to 31 December 2016.

Pigs - dry sow stalls: ban the use of mating stalls outright. There should be no immobilisation of these animals.

Pigs - farrowing crates: ban outright. Ibid.

Rodeos - fireworks: change this regulation to establish an outright ban on rodeo, which is inherently abusive and morally unsupportable.

Exotic animals - circuses: ban outright the use of animals in circuses.

Stock transport - abrasions: ban outright the transport of animals in all situations except to save them from harm or to administer care.

Young calf (all regulations): replace with an outright ban on the killing of calves. Farmers shall have responsibility to care for -- within best standards of feed, water and housing -- the offspring of their cattle for the remainder of the offspring's natural life uninterrupted by slaughter.

All animals - hot branding: expand to **all branding**, except non-invasive branding on sanctuaries to deter theft.

All animals - embryo collection: ban outright.

All animals - artificial insemination: ban outright.

All animals - liver biopsy: add that the supervising veterinarian must file an accompanying report indicating why the biopsy was in the animal's best interest, and that this report must face peer review within 30 days of the procedure.

All animals - dental work: add that no procedure whatsoever may take place without the requirement as above for liver biopsy. Animals must be maintained in their natural state unless such condition is harmful to themselves.

Cattle - teats: remove the provision for <6 weeks and add the same requirement as above for liver biopsy.

Cattle - claw removal: add the same requirement as above for liver biopsy.

Cattle - teat occlusion: remove provision for any particular teat sealant.

Cattle and sheep - castration: ban outright. M.P.I. should be encouraging the harmless development of ingestible birth-control agents.

Cattle, sheep and goats - de-horning: ban outright.

Sheep - tail-docking: remove the provision for <6 weeks and add the same requirement as above for liver biopsy.

Deer - de-velvetting: ban outright.

Horses - castration: ban outright. M.P.I. should be encouraging the harmless development of ingestible birth-control agents.

Llamas and alpaca - castration: ban outright. M.P.I. should be encouraging the harmless development of ingestible birth-control agents.

Pigs - castration: ban outright. M.P.I. should be encouraging the harmless development of ingestible birth-control agents.

Pigs - tail-docking: remove the provision for <7 days and add the same requirement as above for liver biopsy.

Poultry - dubbing: restrict the practice to veterinarians, adding the same requirement as above for liver biopsy.

Roosters - castration: ban outright. M.P.I. should be encouraging the harmless development of ingestible birth-control agents.

Closing comments:

The M.P.I. can't genuinely be focused on "keeping pace with changing scientific knowledge", or else it would advocate for a departure from animal agriculture. The preponderance of clinical trials which are not funded by agribusiness interests find that vegans live 2 to 7 years longer than meat-eaters and that they die better. That's scientific knowledge. The number-1 contributor to the Greenhouse Effect is animal agriculture. That's scientific knowledge. The M.P.I.'s interest in animal welfare must be superficial in order to maintain, more or less, the status quo. The Animal Welfare Act and the permitted breaches against it are testimony to this, as is the insidious make-up of National Animal Welfare Advisory Committees. I commend those who have worked hard to put forth as many improvements as we see in the Discussion Document; I don't mean to belittle your work. I just wish we all saw nonhuman animals as having value to themselves and *their* families.

Billy Leonard

s 9(2)(a)



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Out of Scope

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)

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

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From: Steve and Shelli Mears § 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

§ 9(2)(a)

Address: § 9(2)(a)

Phone: § 9(2)(a)

Dear Sir/Madam,

I thank you for the opportunity to attend the recent consultation meeting in Invercargill, 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

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**Proposed Animal Welfare Regulations
Care and Conduct and Surgical and Painful Procedures.
MPI Discussion Paper No 2016/12**

Submission. Prepared by Ian C Hodge Dip.Ag.,BSc.,Dip.Sci.,BVSc.,MANZCVS (Med. Dairy Cattle)

General Manager Technical Services, Veterinary Enterprises Group Ltd.

Email s 9(2)(a)

Mobile s 9(2)(a)

The following document has been prepared by Ian Hodge as a representative of Veterinary Enterprises Group. The opinions included herein are those of Ian Hodge and not necessarily of all staff employed at Vetent as a full consultation of all staff has not been possible.

I am a veterinarian with 22 year's clinical experience in mixed and dairy practice in New Zealand but not overseas. I am now responsible for technical oversight for Vetent which is New Zealand's largest Veterinary Practice. I have considerable field experience working with MPI on farm animal welfare investigations.

Thank you for beginning the process of animal welfare review and the opportunity to provide feedback on what is an extremely important part of New Zealand Inc.

10th May 2016.

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Answers to Questions.

1. No. Introduce changes at same time as regulations.
2. No. Increase fines to \$1000.
3. No
4. Regulation of lay people involved in animal health and dog and cat breeders
5. No
6. NA
7. No. Regulate all areas
8. There will be greater accountability, some additional costs and further training will be required. Vets are ideally positioned to deliver this or assist MPI to deliver this.
9. I think a minimum should be \$500. Large groups of animals affected should attract higher fines.
10. Yes
11. No.
12. Defences in 4.1.5 are acceptable
13. Yes. Apply it to using prodders to protect animals and humans against very dangerous animals.
14. Yes. some do require a lead in to let people comply and adapt and get educated. Twelve months tops.
15. Include the regulations in the codes.
16. /17. I support the second approach.
18. Invite them to high level meetings.

Proposal Number:1

Proposal Title: Electric Prodders

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Restricted use of prodders
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	How can remote moving/loading situations be monitored?
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No. Prodders are used even on calves being loaded.
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	No. Should be \$500
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	If prodders are used there should be guidelines that establish the length of time a prodder can be applied to an animal and the voltage it can generate. Using prodders at slaughter could affect carcass quality. Ideally prodders should be only used when there is extreme danger to human or animal life.

Proposal Number:2

Proposal Title: All Animals: Use of Goads

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent animal cruelty
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No.
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	No. Should be \$500
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	No justification for goads in these areas. No prodding or goading should be allowed.

Proposal Number: 3.

Proposal Title: All Animals: Twisting an animals tail

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent unnecessary pain and distress to animals
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	No. Mainly occurs in cowsheds. Undetected in many cases
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	Tail twisting only to prevent kicking may be allowed. This is a H and S issue.
Are the penalties appropriate to the severity of the offence?	No. Increase to \$1000
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Yes. Getting first calved heifers to load in to cow sheds often requires tail twisting and pushing. More education is required. An SOP for tail twisting available in cow sheds. More visibility around the fines.

Proposal Number:4

Proposal Title: Pinch and Prong Collars

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent animal pain and distress
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	No. Increase to \$500
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Allow police trainers to use pinch and prong collars. Purchase only allowed with police permit to buy.

Proposal Number: 5.

Proposal Title: Dogs: Injuries from Collars or Tethers

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent pain,suffering and distress
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	Dogs not tethered could roam and cause harm to other dogs or people
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	No. Increase to \$500
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Yes. Restrictions are at the right level. Could re-word to say "must allow feeding, breathing and drinking". Yes cover all species.

Proposal Number:6

Proposal Title: Dogs: Muzzling a dog

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent bites to other animals or humans
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No. Some muzzles can be very restrictive
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	No. Increase to \$500
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Muzzles should only be applied to dogs when the owner or person in charge is present. Unattended dogs should not be muzzled. Captured dangerous dogs should be muzzled until euthanased. Eating or drinking in these situations is not necessary but there should be time limits i.e. dog must be destroyed within one hour of being muzzled.

Proposal Number:7

Proposal Title: Dry and shaded shelter

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent unnecessary distress
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No. Many dogs tied up do not have access to shade or dry areas
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	No. Increase to \$500
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Protections for confined dogs are adequate. The key word here is access. Dogs must always have access.

Proposal Number:8

Proposal Title: Dogs. Dogs left in vehicles

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent unnecessary distress, suffering and death in dogs
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Could add that if dogs are left in vehicles there must be a small opening to allow the dog to breath fresh air. There should be time limits. The animal must be checked every 30 minutes etc.

Proposal Number:9

Proposal Title: Dogs: Secured on Moving vehicles.

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent unnecessary injury and death
What would be the negative aspects of this regulation, including costs of complying?	Dogs tied on vehicles if fall or jump off could be more severely injured than if they can jump or roll away from vehicle.
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	Dogs could be dragged if they fall off
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Tethered dogs can fall or jump off and be dragged. If vehicle is expected to exceed 20km/hr dog must be tethered on a short rope that prevents jumping or falling or moving around on open truck etc...

Proposal Number:10

Proposal Title: Dogs and cats. Drowning dogs and cats

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent unnecessary distress and death
What would be the negative aspects of this regulation, including costs of complying?	Other forms of unauthorised euthanasia may prevail
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Prohibit drowning.

Proposal Number:11

Proposal Title: Eels. Insensible for desliming

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent cruelty
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Drug withhold times would need to be established. Residues may be an issue. Costs also would become an issue.

Proposal Number:12

Proposal Title: Crabs, Rock Lobster and Crayfish. Insensible before being killed.

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent unnecessary pain or distress
What would be the negative aspects of this regulation, including costs of complying?	Costs
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	Possibly to install equipment. 6 months?
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	

Proposal Number:13

Proposal Title: Goats: Tethering Requirements

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent unnecessary distress to goats
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	No. Increase to \$500
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Goats should not be tethered on roadsides. Yes shelter should refer to a structure that enables the goat to enter to be protected from the environment.

Proposal Number:14

Proposal Title: Horses: Use of a whip lead or any other object

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent unnecessary pain/injury to horses
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	No. Increase to \$500
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	No exceptions, no excuses.

Proposal Number:15

Proposal Title: Horses Injuries from equipment

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent unnecessary pain/distress/injury to horses
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	No. Increase to \$500
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Needs to include the use of twitches, mouth gags.

Proposal Number:16

Proposal Title: Horses and Donkeys: Tethering Requirements

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent distress to horses and donkeys
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	No. Increase to \$500
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Need to insert the word "suitable" or "adequate" before shelter.

Proposal Number:17

Proposal Title: Layer Hens Express normal Behaviours

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevention of unnecessary distress to poultry
What would be the negative aspects of this regulation, including costs of complying?	Increased costs
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	Yes
Are there any unintended consequences?	Some businesses may fail. Egg price increases
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Regulation offence is a good deterrent.

Proposal Number:18,19,20

Proposal Title: Layer Hens Stocking Densities, Housing and design, induced moulting.

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Improved poultry welfare
What would be the negative aspects of this regulation, including costs of complying?	Increased costs of compliance
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	Yes
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	

Proposal Number:21,22,23

Proposal Title: Llama and Alpaca. Injuries, companions and offspring.

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Improved Camelid wellness
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	No. Increase to \$500 for all.
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Cuts abrasions and swelling are appropriate terms. Camelids need companions. Cria should always have companions.

Proposal Number:24,25,26,27,28

Proposal Title: Pigs Sleeping, Lying, Dry sow stalls, farrowing crates

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Improved pig and piglet wellness
What would be the negative aspects of this regulation, including costs of complying?	Increase costs of compliance, pork, bacon, etc.
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	Yes.
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Agree with all pig proposals.

Proposal Number: 29

Proposal Title: Rodeo Fireworks.

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent distress to rodeo animals and injury to people.
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Agree.

Proposal Number: 30.

Proposal Title: Exotic Animals Used in Circuses

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Improved exotic animal wellness
What would be the negative aspects of this regulation, including costs of complying?	Possibly increased animal housing requirements and associated costs. Possible loss of animals in circuses which is not a bad thing.
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	Yes
Are there any unintended consequences?	Loss of all animals in circuses
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	As long as animals are used in circuses they should be subject to the 5 (6) freedoms.

Proposal Number: 31, 32,

Proposal Title: Cattle. Milk Stimulation and vehicular traction at calving

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevention of unnecessary pain, injury and distress.
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	\$500 in both cases
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Agree prohibition in both cases. Need to update DairyNZ, DCV, NZVA etc.

Proposal Number:33

Proposal Title: Cattle and Sheep. Ingrowing horns.

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Prevent pain and possible death
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	Farmers may decide to dehorn animals before sending to the works
Do you think the regulation will achieve its aim?	Yes, but will need policing by on farm MPI visits and ante mortem vigilance
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Availability of vets to dehorn animals may be an issue. Ingrowing horns are obvious long before they touch the skin. Touching the skin is the trigger. Anything more than that is an issue. Shortening applies to leaving the horn the same length as the animal's ear. Anything more is de horning. Wounds should be given a week or so to heal and should be checked by a veterinarian.

Proposal Number:34,35,36,37,38,39,40,41,42,

Proposal Title: Stock Transport.

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Improved animal wellness, reduced pain, distress, death.
What would be the negative aspects of this regulation, including costs of complying?	Veterinary costs of certification and treatment
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Agree with all transport proposals.

Proposal Number:43,44,45,46,47,48,49,50,

Proposal Title: Young Calves. Transport, blunt force trauma and Cook Straight

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Improved young calf welfare. Reduced distress. Improved international reputation.
What would be the negative aspects of this regulation, including costs of complying?	Costs of compliance
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	Yes. 12 months max.
Are there any unintended consequences?	Increased cartage costs? Less Bobby calves sold (not really a disadvantage)
Do you think the regulation will achieve its aim?	Questionable.
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	Need to involve the veterinary profession. They are in the ideal position to monitor bobby calf welfare, transport preparation on farm
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Monitoring is the key. Variations from what is expected can occur on farm when "no one is looking". Improved holding areas and loading ramps will prevent much loading abuse. Agree with feeding regulations and maximum travel times. Put more accountability on processors to kill within 24 hours. Allow vets more involvement in on farm monitoring and in compliance certification.

Proposal Number: 51

Proposal Title: All Animals Hot Branding

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Reduced animal pain and suffering
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Agree. Prohibit hot branding.

Proposal Number:52

Proposal Title: Embryo collection via exteriorised uterus (surgical embryo transfer)

Should this area be regulated?	Yes. It should be VET ONLY
What would be the positive impacts of this regulation?	Improved animal wellness, reduced pain, infection risk,
What would be the negative aspects of this regulation, including costs of complying?	Veterinary Costs
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	This is a significant surgical procedure and should only be performed by a suitably qualified veterinary surgeon.

Proposal Number:53

Proposal Title: Laparoscopic artificial insemination

Should this area be regulated?	Yes. Must only be undertaken by veterinarians or under DIRECT veterinary supervision.
What would be the positive impacts of this regulation?	Improved animal wellness, possibly improved fertility
What would be the negative aspects of this regulation, including costs of complying?	Costs (vet)
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	Yes. Training requirements. 12 months
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	This is significant surgery. Carries infection risk etc. Should only be performed by suitably trained veterinarians.

Proposal Number:54

Proposal Title: All Animals Liver Biopsy

Should this area be regulated?	Yes. The training and skill required to accurately and safely locate the liver in all species requires veterinary training and so this should only be undertaken by veterinarians trained in the species they are working with.
What would be the positive impacts of this regulation?	Improved animal wellness
What would be the negative aspects of this regulation, including costs of complying?	Costs?
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Vet only procedure in any species.

Proposal Number:55

Proposal Title: All animals Dental Work

Should this area be regulated?	Yes. Successful dentistry in most species requires RVM sedation and possibly RVM local/regional anaesthesia. Therefore all dentistry should only be performed by suitably trained veterinarians.
What would be the positive impacts of this regulation?	Improved animal wellness
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Only veterinarians know accurately the oral anatomy necessary to carry out successful dentistry and use the appropriate equipment and drugs required.

Proposal Number: 56

Proposal Title: Cats. DeClawing

Should this area be regulated?	Yes. Prohibit cat de clawing unless done for therapeutic reasons.
What would be the positive impacts of this regulation?	Improved cat wellness
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes. Although there may be some underground procedures undertaken?
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Prohibit unless claws have been ripped or torn etc, and then should be treated by a small animal veterinarian.

Proposal Number:57

Proposal Title: Companion animals Desexing

Should this area be regulated?	Yes. All desexing should be vet only.
What would be the positive impacts of this regulation?	Improved animal wellness
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	Some animals may not get de sexed. May lead to more unwanted litters. Vets may have to address this issue.
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	Yes
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Vet Only.

Proposal Number: 59

Proposal Title: Dogs De barking

Should this area be regulated?	Yes. Surgery to the larynx and pharynx should be only undertaken to treat surgically correctable disease and should only be undertaken by a suitably qualified veterinary surgeon under surgical conditions.
What would be the positive impacts of this regulation?	
What would be the negative aspects of this regulation, including costs of complying?	
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	
Are there any unintended consequences?	
Do you think the regulation will achieve its aim?	
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	
Are there any non-regulatory options that would be more effective?	
Has the right conduct been targeted?	
Is the right person being held responsible?	
Are there any exemptions or defences that should apply?	
Are the penalties appropriate to the severity of the offence?	
Is the right type of offence(regulatory or infringement) proposed?	
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	
Other Comments.	

Proposal Number:60,61,62,

Proposal Title: Dogs Cropping The Ears, Dew Claws, Tail docking.

Should this area be regulated?	Yes. Prohibit cropping ears, hind limb dew claws are officially dew claws and can be removed by a veterinarian under surgical conditions only. Front dew claws should generally not be removed as it is a functional digit. Tail docking only done by a vet using local anaesthesia.
What would be the positive impacts of this regulation?	Improved animal wellness
What would be the negative aspects of this regulation, including costs of complying?	Some may decide to "do it themselves".
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	Animal suffering from "DIY surgery"
Do you think the regulation will achieve its aim?	Probably
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	No
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Agree with proposals.

Proposal Number: 63,64,65,66, 67,68,69,70,71,

Proposal Title: Cattle and sheep. Teats, claw amputation, teat occlusion, tail docking, Cryptorchid, disbudding, dehorning, tail docking, mulesing.

Should this area be regulated?	Yes. 63. Agree. Add that post surgical disinfection must be used to prevent infection in all cases. 64, Agree. 65, Agree. 66, Agree. 67, Add (under 6 months of age) "must be undertaken by a person suitably trained". 68, Disagree. Should only be undertaken by veterinarians or veterinary technicians trained and able to possess and use local anaesthetic. Local anaesthetic should not be dispensed to lay people. 69, Shortening to the length of the ear can be done by trained lay staff. Full length horn removal should only be done by a veterinarian. 70, Agree but should consider the use of oral analgesic gels. 71, Agree.
What would be the positive impacts of this regulation?	
What would be the negative aspects of this regulation, including costs of complying?	
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	
Are there any unintended consequences?	
Do you think the regulation will achieve its aim?	
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	
Are there any non-regulatory options that would be more effective?	
Has the right conduct been targeted?	
Is the right person being held responsible?	
Are there any exemptions or defences that should apply?	
Are the penalties appropriate to the severity of the offence?	
Is the right type of offence (regulatory or infringement) proposed?	
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices.	

Are there any religious or cultural practices that would be impacted by the proposals?	
Other Comments.	

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Proposal Number: 72

Proposal Title: Deer Develvetting

Should this area be regulated?	Yes
What would be the positive impacts of this regulation?	Continue to see develvetting as a significant surgical procedure.
What would be the negative aspects of this regulation, including costs of complying?	Minimal
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	Yes
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	Regulate to ensure the current practices stay in place. This process could threaten overseas trade.

Proposal Number:73,74,75,76,77,78

Proposal Title: Horses: Blistering, tail docking, rectal examination, Caslicks, castration,

Should this area be regulated?	Yes. 73, Agree. 74, Agree. 75, Agree. 76, Agree. 77, Agree. 78, Agree.
What would be the positive impacts of this regulation?	
What would be the negative aspects of this regulation, including costs of complying?	
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	
Are there any unintended consequences?	
Do you think the regulation will achieve its aim?	
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	
Are there any non-regulatory options that would be more effective?	
Has the right conduct been targeted?	
Is the right person being held responsible?	
Are there any exemptions or defences that should apply?	
Are the penalties appropriate to the severity of the offence?	
Is the right type of offence(regulatory or infringement) proposed?	
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	
Other Comments.	

Proposal Number:79

Proposal Title: Llama and Alpaca: Castration.

Should this area be regulated?	Yes. Agree. Vet only significant surgical procedure.
What would be the positive impacts of this regulation?	Improved animal wellness
What would be the negative aspects of this regulation, including costs of complying?	None
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	No
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	Yes
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	

Proposal Number: 80

Proposal Title: Pigs: castration.

Should this area be regulated?	Yes. Significant and complex surgery. Vet only.
What would be the positive impacts of this regulation?	None
What would be the negative aspects of this regulation, including costs of complying?	Possibly costs.
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	Possibly DIY surgery
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	Yes
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	

Proposal Number: 81.

Proposal Title: Pigs Tail Docking.

Should this area be regulated?	Yes. Agree with proposal.
What would be the positive impacts of this regulation?	Improved animal wellness
What would be the negative aspects of this regulation, including costs of complying?	Costs
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	No
Are there any unintended consequences?	DIY surgery possibly
Do you think the regulation will achieve its aim?	Yes
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	Yes
Are there any non-regulatory options that would be more effective?	No
Has the right conduct been targeted?	Yes
Is the right person being held responsible?	Yes
Are there any exemptions or defences that should apply?	No
Are the penalties appropriate to the severity of the offence?	Yes
Is the right type of offence(regulatory or infringement) proposed?	Yes
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	No
Other Comments.	

Proposal Number:82,83,84,85.

Proposal Title: Birds: Pinioning/deflighting,Dubbing, declawing Ostrich/Emu, caponising.

Should this area be regulated?	Yes. 82. Agree, 83. Agree, 84. Agree, 85. Agree.
What would be the positive impacts of this regulation?	
What would be the negative aspects of this regulation, including costs of complying?	
Would a transitional or phase in period be required to manage these impacts? If so how long would be appropriate?	
Are there any unintended consequences?	
Do you think the regulation will achieve its aim?	
Is the current issue being managed adequately by codes of welfare or other instruments under this act?	
Are there any non-regulatory options that would be more effective?	
Has the right conduct been targeted?	
Is the right person being held responsible?	
Are there any exemptions or defences that should apply?	
Are the penalties appropriate to the severity of the offence?	
Is the right type of offence(regulatory or infringement) proposed?	
It is important that the regulatory proposals will not place an unjustifiable limitation on a person's religious or cultural practices. Are there any religious or cultural practices that would be impacted by the proposals?	
Other Comments.	

Summary Comments.

- Increasing regulation will remove ambiguity and mitigate animal cruelty.
- Financial penalties should be a deterrent
- Increased (on farm) monitoring will be required
- Increased veterinary involvement will be required to ensure compliance
- Increased veterinary engagement with MPI will be required to ensure compliance
- Overseas trade requirements will probably dictate increased veterinary training and involvement.
- Pain relief is critical often before, during and after significant surgical procedures. Animals are no different to humans. Do we operate on human babies without analgesia?
- Lay people will need increased monitoring. There may be significant welfare issues in those areas.
- We support the concept of improving animal welfare standards based on current scientific knowledge.
- Education plays a critical role for farmers and stakeholders e.g. truck drivers
- Regulations need to be included in the animal welfare codes.
- The animal welfare code should be rolled in to one document.
- MPI and Vets should re train farmers/stock owners
- MPI/RNZSPCA/NZVA need to collaborate more.

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Animal welfare proposed regulations feedback submission form

Your name: Jon Terry

Your organisation (if applicable): None

Your contact details: [REDACTED]

Your feedback: I grew up on a dairy farm. I witnessed very poor treatment of bobby calves when they were being put on the truck.
I'm not sure how you police this treatment from pen to truck, ~~ok~~ but I would like to see a complete shake-up of the trucking companies' methods immediately. Since I saw this treatment in the 1970s, I'm astounded that this treatment still exists 40 years later.

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

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

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

Submissions close 5pm 19 May 2016.

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

✓ 175

From: Romina Marinkovich <9(2)(a)>
Sent: Thursday, 19 May 2016 2:58 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations' in the subject field

Categories: Blue Category

MPI Animal Welfare Codes Submission

Nathan Guy Minister for Primary Industries

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

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

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

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

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

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

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

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

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

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

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

16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		<p>I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met¹.</p> <p>1) Sections 9, 68 Animal Welfare Act 1999</p>
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully¹. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens². Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes³) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> • Sufficient length of perching space to allow all birds to perch at the same time; and • Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night. <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. 'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'⁴.</p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens⁴. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage 2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57. 3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832. 4) Cooper, J.J. and Ablentosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>

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

		<p>clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m²) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m²) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spoolder, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&context=kaesrr ibid. Page 9</p> <p>"ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 <https://www.mpi.govt.nz/document-vault/1446></p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC¹. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates^{2,3}.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>"National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</p> <p>Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</p> <p>KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. http://www.sciencedirect.com/science/article/pii/S0167587711003564</p>
28	Pigs	Provision of nesting material
		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust¹</p>

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

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

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

45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age¹ therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		<p>I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.</p>
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper¹ does not demonstrate that:</p> <p>this is in fact the case in calves <5 days of age or</p> <p>that these calves are not experiencing significant hunger or</p> <p>that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study²</p> <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves¹ we propose an increase in the infringement penalty to \$1000.</p> <p>Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		<p>I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.</p>
50	Young Calves	Transport by sea across Cook Strait prohibited
		<p>I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.</p>

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

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

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

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

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

Harry Livesey (Harry)

From: Bridget Bucknell <s9(2)(a)>
Sent: Friday, 29 April 2016 9:52 a.m.
To: Animal Welfare Submissions
Subject: Animal welfare

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Green Category

176

I think all live exports should be stopped.

Dairy industry should NOT be impregnating dairy cows constantly to maintain milk flow. It's all out of balance. Cows suffer terribly when their babies are taken away and the energy from the planet, water, feed, water to grow the feed, to create something that will be killed within 48 hours of its life? It is 100% barbaric.

(obby claves, veal, by product, whatever you want to label it, is wrong and a stain on the human consciousness.

Pig crates should be illegal. In nature are there pig crates for wild pigs?

The horse racing industry needs to be looked at. From Canterbury region alone 200 horses a week are sent to the dog food factory in Invercargill as they didn't make the grade, and this is sustainable!

This is wrong.

I have seen depressed, joyless and broken horses coming out of this industry.

I do not eat beef nor do I support the racing industry anymore.

We need much stricter rules on animal welfare. Way stricter than being proposed.

Animal owners, farmers, trainers, breeders, ALL should be licensed and checked on regularly if they are to own, farm, whatever, any kind of animal.

I will support that.

Bridget Bucknell

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Morgan <9(2)(a)>
Sent: Thursday, 19 May 2016 3:13 p.m.
To: Animal Welfare Submissions
Subject: Submission on animal welfare regulations

Categories: Blue Category

I support all the points & recommendations made below

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

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

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

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history¹. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare². I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

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

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

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>I propose that the use of electric prodders be banned under all circumstance are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on:</p> <ol style="list-style-type: none"> a. the species and size of an animal b. the manner of use of an animal (circus)

		c. the location of the animal (slaughter premises) I support the proposed infringement penalty.
2	All animals	Use of goads
		I support the proposal to ban the use of goads on sensitive areas of an animal under certain circumstances. Given the deliberate cruelty involved in using goads on sensitive areas, I support the proposed infringement penalty of \$500.
3	All animals	Twisting an animal's tail
		I support the proposal to prohibit painful twisting of an animal's tail. Given the significant pain and damage from this behaviour, and the deliberate nature of the act, the infringement penalty is set at the higher level of \$500.
Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals)
		Despite footage from 2015 clearly showing several different people throwing animals during loading ¹ , only one individual was prosecuted in relation to the footage relating to the more severe actions at the slaughterhouse rather than those of loading the trucks. There is clearly a need for simple, easily enforceable, laws to prevent the mistreatment and mishandling of animals which is not provided for in the current proposals. I support the regulatory proposal as stated above. I propose the offence to be an infringement with a maximum penalty of \$1000 to reflect both the potential for severe harm from such an act and to provide a strong discouragement from this behaviour. 1) http://safe.org.nz/nz-dairy-industry-exposed 2) https://www.mpi.govt.nz/news-and-resources/media-releases/charges-in-bobby-calf-investigation/
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstance where dogs are used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not cause distress. Given the potential for severe injury from collars I propose the penalty to be a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause distress. I support the inclusion in the proposal that muzzles should allow for a dog to breathe and support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter

		I support the proposal for dogs to have access to dry and shaded shelter at a the inclusion in the proposal that dogs also have access to fresh, palatable d times. Given that shelter and water are basic needs of life neglecting these i potential to cause significant harm and even death therefore I propose the ir to be increased to a prosecutable offence. I also propose that there be a max that a dog is allowed to be chained for at any one time and that an infringer exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their sal increasing the penalty to a prosecutable offence both to reflect the potential injury and also to act as a suitable penalty to prevent this behaviour. Additic penalty allows for effective prosecution of corporations who use dogs who l responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose includi on private property in the regulation, and propose a speed limit of 40kph for unsecured working dogs. I propose increasing the penalty for infringement i potential for severe injury, suffering, and death resulting from falling from :
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China
		The Macau and China greyhound racing industries do not have the same sta welfare as NZ. The export of racing greyhounds between NZ and Hong Kon transport to Macau/China) is minimal at present. However if the export of g other countries (Australia, Ireland) is banned or more heavily regulated ther a transport hub for dogs in this industry. This has the potential for poor wel dogs and very poor public perception in New Zealand. It is far better to ban before it has the potential to become established. MPI have demonstrated th put in place infringements for uncommon industry activities which have the become welfare issues in the future with proposal 50 in this document bann young calves across cook strait. I propose the above regulation and propose penalty is set at a prosecutable offence.
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drownir infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed be deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed

		<p>I support the proposal that crabs, rock lobster, and crayfish must be insensit killed. I dispute the NAWAC statement that chilling to <4 degrees Celsius r insensible and propose that either:</p> <p>a. the only legally acceptable method of rendering crabs and cray by electrical stunning (for which specific equipment is available for use in s premises). OR</p> <p>b. NAWAC conduct a review of the recent (since 2000) scientific humane slaughter of crustaceans and present good quality, recent evidence 1 that chilling to <4 degrees Celsius renders crustacean insensible.</p> <p>I support the proposed penalty of a prosecutable offence for failing to rende insensible prior to slaughter.</p>
13	Goats	Tethering requirements
		<p>I do not support the tethering of goats, on the basis that it stops goats expres behaviours, and propose that tethering is prohibited with an infringement pe Furthermore I share concerns with previous submissions around tethering o witnessing tethered goats on the road side could easily get a negative impre: welfare in NZ.</p> <p>I propose that all goats, regardless of housing system, have access to a dry a appropriate food, and fresh palatable water at all times and that lack of prov requirements is an infringement with a penalty fee of \$500.</p> <p>I also propose that as goats are social animals¹ all goats should be provided such as another goat, camelid, horse, donkey or sheep. I propose that failure with a companion should attract an infringement penalty of \$300.</p> <p>1. Miranda-de la Lama, G.C. and Mattiello, S. (2010). The importance o for goat welfare in livestock farming. Small Ruminant Research 90, (</p>
14	Horses	Use of a whip, lead, or any other object
		<p>I support the prohibition of using a whip, lead or other object to strike aroun support the proposed infringement penalty of \$300.</p>
15	Horses	Injuries from equipment such as halter, head ropes and saddles
		<p>I support the proposal to ensure that equipment is used in a manner that doe or distress. I support the proposed infringement penalty of \$300.</p>
16	Horses and Donkeys	Tethering requirements
		<p>I do not support the tethering of horses and donkeys and propose that tether with an infringement penalty of \$300. I propose that all horses and donkeys dry and shaded shelter, appropriate food, and fresh palatable water at all tir housing system and that lack of provision of these requirements is an infrin; penalty fee of \$300.</p>
17	Layer Hens	Opportunity to express normal behaviours in housing systems

		<p>I believe that colony cages do not adequately consider the welfare of layer hens and prohibit the ability of the hen to express a range of normal behaviours. In a colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow persons in charge of animals to take all reasonable steps to ensure that their behavioural needs are met¹.</p> <p>1) Sections 9, 68 Animal Welfare Act 1999</p>
18	Layer Hens	Stocking densities
		<p>Colony cages do not allow hens to engage in a range of normal behaviours and are in clear breach of the Animal Welfare Act 1999. With a stocking density of 10 square metres per square metre or 750 square centimetres, clearly the stocking density is too high.</p>
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide some welfare gestures like nest boxes, scratch pads and perches, these gestures do not meet the physical, health and behavioural needs of hens. With only 750 sq cm per hen, a number of behaviours hens are not able to functionally perform in colony cages, such as spreading her wings fully¹. It's also questionable whether a hen in a colony cage can nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe. Research has shown that some hens in colony cages can be prevented from nesting provided due to competition from other hens². Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes³) if they wish to dust bathe at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> • Sufficient length of perching space to allow all birds to perch at the same time. • Sufficient elevation of the perches to satisfy the hens' requirements for perching place at night. <p>Colony cages fulfil neither of these requirements. The standard of approximately 100cm per hen is an average and does not allow consideration for larger birds. Perch systems are situated on average just a few centimetres from the floor of the cage. The standard positioned 5cm above floor level is 'not considered as a perch (by a hen) as it has a low or repulsive value'⁴.</p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare as they make great efforts to access litter for pecking, scratching and dustbathing – all of which are natural behaviours of hens⁴. When hens are unable to forage in litter, they can redirect their energy towards other hens resulting in harmful feather pecking and even cannibalism. If unable to dustbathe in litter, they can develop the dysfunctional behaviour called 'wing-flipping'.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the length of the battery cage.</p> <p>2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in different types of standard or furnished cages</i>. Animal Research, 53: 45-57.</p> <p>3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Applied Animal Behaviour Science, 77: 1828-1832.</p> <p>4) Cooper, J.J. and Ablentosa, M. J. (2003) Behavioural priorities of laying hens. Poultry Biology Reviews, 14: 127-149.</p>
20	Layer Hens	Induced moulting

		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not cause distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		Proposal: I support the proposal that all pigs have access to a dry sleeping area. Penalty: I support the proposed infringement penalty of \$300.
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error. The exponent notation has not been applied. I believe the formula intended by the proposal is $\text{live weight}^{0.67} (\text{kg})$ but instead it reads $\text{live weight } 0.67(\text{kg})$ which translates to $0.03 * \text{live weight} * 0.67(\text{kg})$ and results in a much higher space requirement. Therefore I contend that proposal 25 must be rewritten and resubmitted for consideration with the correct formula included so that the intended space requirement can be considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. found that ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.3 underestimate the impact of increased stocking density on ADG and ADFI². A k-value of 0.3 is too low to provide grower pigs with this environment and does not meet the minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (i.e., when grower pigs have reached the capacity of their pen and are shortly to be moved to a finishing pen). A minimum standard which is considered acceptable at all times and this should be the regulation itself.</p>

		<p>I consider the minimum standards of housing for pigs to be provide “suffici them to perform natural behaviours such as lying on their side without touch standing up, turning around and performing exercise, space for separate are feeding, with a dunging areas situated a sufficient distance from sleeping ar well as materials to enable them to root and forage”⁴. If these standards car current farming systems then we are concerned that the current farming sys compatible with the freedom to exhibit normal behaviour and breech the an The current regulation has no limit on the length of time during which a gro submitted to the proposed minimum standard. Overstocking is a known pro concerned that grower pigs may be submitted to spaces which do not meet 1 requirement if their transfer to a new pen is delayed. I would like the regul that it is unacceptable for growers to be kept for prolonged periods in space minimum requirement. In its 2010 review, NAWAC submitted that space e pigs to lie fully recumbent (k-value of 0.047) was recommended best practi For the sake of clarity and to give effect to the intention of NAWAC, I sugg period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is an Grower pigs housed inside on non-litter systems such as slatted or solid floo space of at least: Area (m2) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floo lying space of less than: Area (m2) per pig = 0.047 x live weight 0.67(kg) f week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fang M. Meunier-Salaun, R. B. Morrison, H. Spoolder, P. L. Sundberg, and A. K Application of broken-line analysis to assess floor space requirements of nu finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>Thomas, LL. "The Effects of Increasing Stocking Density on Finishing P 2015. http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&context ibid. Page 9</p> <p>"ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2 <https://www.mpi.govt.nz/document-vault/1446></p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regu</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viabl production. It is widely accepted that sow welfare in farrowing crates is sul optimal. Continuing a production system which is contrary to good practice knowledge is in direct violation of section 10 of the Animal Welfare Act 19 In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NA report, NAWAC stated that “no significant change in science, technology o 2010 when the pigs code of welfare was issued”. It submitted that the level in farrowing pens is higher than in farrowing crates and used this as justific</p>

		<p>farrowing crates in New Zealand. However, there is abundant research which concludes that total piglet mortality on farms with loose farrowing systems is lower than that of farms with crates^{2,3}.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production and must be banned outright.</p> <p>"National Animal Welfare Advisory Committee - NZPork." 2016. 15 May 2016 http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-nz</p> <p>Weber, R. "Piglet mortality on farms using farrowing systems ... - Ingentaconnect." 2007. http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016</p> <p>KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. http://www.sciencedirect.com/science/article/pii/S016758771100356</p>
28	Pigs	Provision of nesting material
		<p>Proposal: I support the provision of nesting material that can be manipulated in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>I agree that the definition of manipulable material should be made more appropriate to ground level which mimics that of natural nesting material and encourages "rooting behaviour" would be appropriate. However, for clarity, I recommend the definition provided for guidance. Appropriate examples would include straw and sawdust.</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p> <p>Chaloupková, H. "The effect of nesting material on the nest-building and ... - NCBI." 2011. http://www.ncbi.nlm.nih.gov/pubmed/20889685</p>
29	Rodeos	Fireworks
		<p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well known as a stressor in companion animals (Bolster 2012; Dale et al., 2010) And Unexpected movement will cause the fight or flight response in both horses and cattle (I Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy and recently submitted to parliament has 62,000 members of the public in support. Rodeo is in breach of the animal welfare act which states that animals should be handled in a manner which minimises the likelihood of unreasonable or unnecessary distress.' The rodeo is a form of entertainment therefore making it an unnecessary risk to animals to be involved in. The likelihood of animals feeling distress while performing could only be successfully minimised if rodeos were entirely stopped; goading and states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in the past, I strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware that this will be brought before MPI for a third year running, this adds to the evidence that the codes are not adequate for protecting animals, therefore we feel that the only way breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses

		I do not support the use of exotic animals in circuses and propose that their Given that there are currently no circuses in NZ using exotic animals the ba practice now will cause no industry disruption. Popular opinion both here a moving away from the use of exotic animals in circus and if this practice w NZ it is likely that there would be a public outcry against it.
31	Cattle	Milk stimulation
		I support the proposal to prohibit the stimulation of milk let down by inserti a cow's vagina. I propose the prohibition is extended to include the insertio a cow's vagina to stimulate milk let down. I support the proposed infringement \$300.
32	Cattle and Sheep	Vehicular traction in calving or lambing
		I support the proposal to prohibit the use of a moving vehicle to provide tra calving. I support the proposed infringement penalty of \$500.
33	Cattle and Sheep	Ingrown horns
		I support the proposal to require treatment for horns that are touching the sk the proposed infringement penalty of \$500.
34	Stock transport	Cuts and abrasions
		I support the proposal that transport should not result in cuts or abrasions. I regulation is extended to all animals' not just cattle, sheep, deer, goats, and infringement penalty of \$500.
35	Stock transport	Animals with ingrown horns
		I support the proposal that animals with ingrown horns must not be transpor fit for transport by a veterinarian. I support the proposed infringement pena
36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not b certified fit for transport by a veterinarian. I support the proposed infringem
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause i or others during transport. I could not find any rationale for the use of 110m for long antler either in the code of welfare, or the report on the code. I prop publish the rationale behind the cut off value of 110mm or perform analysis

		sustained from transport of animals with horns to determine if this measure is appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness score certified for transport by a veterinarian and that animals with a lameness score are transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury are not certified for transport from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not closed, or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities
		I support the proposal that facilities must be provided which enable young calves to get on and off transportation by their own action. Given the potential for severe injury, I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be lifted to the ground so they are able to balance on all four feet or sit in sternal recumbency (recumbency for sick calves).

		<p>Despite footage from 2015 clearly showing several different people throwing during loading¹, only one individual was prosecuted in relation to the footage relating to the more severe actions at the slaughterhouse rather than those of loading the trucks. There is clearly a need for simple, easily enforceable, laws to prevent the mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement at \$1000 to reflect both the potential for severe harm from such an act and to discourage from this behaviour.</p> <p>http://safe.org.nz/nz-dairy-industry-exposed https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-calf-investigation/</p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		<p>I propose a minimum training standard is put in place for people loading calves for transportation. Footage from 2015 clearly shows inappropriate handling of calves during loading¹. A regulation for minimum training standards for those loading calves will improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for them to demonstrate willingness to improve welfare outcomes for calves could reduce public confidence in the media. I propose infringement penalty is prosecution due to the lack of providing training being a corporation level infringement and therefore an appropriate penalty significant enough to deter corporations from flouting the law.</p> <p>http://safe.org.nz/nz-dairy-industry-exposed</p>
Proposed	Young Calves	Same day slaughter
		<p>I propose that all young calves received at a slaughter premises must be slaughtered and cannot be held overnight. It has been recognised by MPI that time off feed is a welfare concern in young calves therefore reducing the time spent at a slaughterhouse to reduce the risk of calves spending an extended period of time off feed. An alternative proposal could be for feeding at arrival at slaughter premises given issues of housing young calves I consider reducing holding time to a minimum of the options. I propose an infringement penalty set at prosecution level so that it is severe enough to prevent corporations flouting the law.</p>
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determining factors in poor welfare outcomes for calves¹. For this reason I propose that calves are required to be transported to the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves during long distance transport. AVJ 2005; 83: 82-84</p>
44	Young Calves	Shelter on farm, before and during transportation and at processing plants

		I support the proposal for minimum standards of shelter on farm, before transport to slaughter premises. I support the higher proposed infringement penalty of \$1000.
45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring what is considered an acceptable standard of welfare in other developed countries. It is stated that the 4 day standard suggested in the proposed regulation has been shown to reflect current industry practice. However the transport code of welfare only allows transport to be performed in calves 5-10 days of age¹ therefore I propose that the absolute minimum age for transport be set at 5 days of age. I support the most conservative determination of age is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Knowles, T.G. 1997. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		I support the proposal that the list of physical characteristics provided with the code of welfare be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves. I propose this is reduced to 12 hours. The lack of physiological indicators in the study¹ does not demonstrate that:</p> <ul style="list-style-type: none"> this is in fact the case in calves <5 days of age or that these calves are not experiencing significant hunger or that these calves have the physiological capacity to respond to transport with the tools used in the study² <p>I propose that calves undergoing transport are kept to the same feeding schedule as they have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Knowles, T.G. 1997. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.A.J. 1997. Effects on calves less than one month old of feeding or not feeding prior to transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. It has been shown that transport has been shown to be associated with poorer outcomes for calves¹ therefore I propose an increase in the infringement penalty to \$1000.</p>

		Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves long distance transport. AVJ 2005; 83: 82-84
49	Young Calves	Blunt force trauma
		I support the prohibition of the use of blunt force trauma for killing calves. I support a severe penalty of prosecution as this allows corporations to receive appropriate deterrence to deter this behaviour.
50	Young Calves	Transport by sea across Cook Strait prohibited
		I support the prohibition of transport of young calves across Cook Strait. I support a severe penalty of prosecution as this allows corporations to be held accountable.
Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose that it be prohibited outright. In the event that it is not prohibited then I propose that the procedure be restricted to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it be regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice outright. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it be regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians and directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work

		I support the proposal that any power tool used for dental work must be des purpose of dentistry. I propose the infringement penalty is increased to \$100
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veter supervised veterinary student, only in the animal's best interest, and the use propose that to ensure the procedure is always performed in the animal's be consultation with a veterinary behaviourist is required prior to the procedure to ensure all non-surgical options for managing the behaviour have been ful However I recognise this aspect of the proposal may be best administrated t veterinary council rather than MPI. I support the proposed penalty of a pros
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinari supervised veterinary student, and the use of pain relief at the time of the pr the proposed penalty of a prosecutable offence. I purpose that all cats and d shops be desexed and vaccinated before being released to the purchaser. Th preventative step in helping reduce the number of stray/feral cats and dogs c
58	Dogs	Freeze branding
		I propose that freeze branding of dogs is banned. With better technology no microchip dogs rather than freeze branding them. In the case that freeze bra prohibited I support the restriction of freeze branding to being performed or or directly supervised veterinary student, and the use of pain relief at the tin I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a vete supervised veterinary student, only in the animal's best interest, and the use propose that to ensure the procedure is always performed in the animal's be consultation with a veterinary behaviourist is required prior to the procedure to ensure all non-surgical options for managing the behaviour have been ful However I recognise this aspect of the proposal may be best administrated t veterinary council rather than MPI. I support the proposed penalty of a pros
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the propos prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being perfor veterinarian or directly supervised veterinary student for therapeutic reason: pain relief at the time of the procedure. I propose restriction of removal of n

		claws to being performed only by a veterinarian or directly supervised veterinarian. I support the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. Pain relief must be used at the time of this procedure.
63	Cattle	Teats
		<p>I support the proposal for supernumerary teat removal of animals >6 weeks of age performed by a veterinarian or veterinary student and that pain relief must be used at the time of the procedure. I support the removal of supernumerary teats in animals <6 weeks of age with pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that:</p> <ul style="list-style-type: none"> the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age i) infringement penalty of prosecution pain relief is required for any supernumerary teat removal procedure ii) infringement penalty of prosecution procedure is performed using sterilised equipment iii) infringement penalty of \$500 any person performing the procedure who is not a veterinarian or direct veterinary student is signed off by a veterinarian iv) infringement penalty of prosecution
64	Cattle	Claw removal
		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. In addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.
65	Cattle	Teat occlusion
		I support the proposal that teat sealing can only be performed with a product for a specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking
		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.

67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		I support the proposal for surgical castration at any age to be limited to vete directly supervised veterinary students and that pain relief must be used. I s that non-surgical castration in cattle and sheep over 6 months of age to be li veterinarians and directly supervised veterinary students and that pain relief does not support the age of 6 months as an appropriate age at which lay peo perform non-surgical castration and propose that this age limit is lowered to limiting the manner of non-surgical castration to only the use of convention does not support performing non-surgical castration without pain relief at a that pain relief is required for any castration procedure at any age. I propose the pain relief at the time of the procedure additional NSAID pain relief is a propose that the penalty for all infringements other than lack of NSAID use that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veter student under direct supervision, or skilled lay person signed off by a veteri tech/appropriately trained farm worker). I propose that appropriate maximum determined for disbudding to be performed by a lay person. I support the us during the procedure and propose that additional NSAID pain relief is also : support the proposed penalty of prosecution for lack of use of pain relief an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veter veterinary student under direct supervision. Given the much greater risk of j infection from dehorning rather than disbudding I propose that farmers are ; warning after which dehorning can only be performed by veterinarians. Thi message that disbudding is much preferred and much more economically vi use of pain relief during the procedure and propose that additional NSAID p administered. I support the proposed penalty of prosecution for lack of use (propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking
		I support the limiting of tail docking in sheep who are greater than 6 months veterinarians and directly supervised veterinary students. I support the use c the procedure and propose that additional NSAID pain relief is also adminis I support restricting the techniques for tail docking in younger animals to ru iron only. I propose that pain relief at the time of procedure and NSAID sho required, regardless of age at the time of tail docking.

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

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

		interpretation. I propose that the regulation prohibit all declawing of emu or performed by a vet for therapeutic reasons. I support the penalty of prosecution.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.

Aisha Hill

s 9(2)(a)

Sent from my iPhone

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Joanne Rusbatch <9(2)(a)>
Sent: Friday, 13 May 2016 3:28 p.m.
To: Animal Welfare Submissions
Subject: Bobby Calves

To whom this concerns Maybe all of us?

As I feel like a spokesperson for I know MANY people ie concerned humans, and know I speak for many and also the bobby calves and their mothers when I propose that a cow having given birth will give milk continually due to the suckling reflex and therefore (a point I didn't see in the changes listed in the list on the Ministry of primary industries Young calves) being involved in the medical field for most of life has showed this truth up and also my time as a mother, surely this total and utter cruelty continually shown to the babies and mothers each YEAR is it not necessary;

And who knows could carry on over to the milk; in the form of too much stress in mother cows I know I wonder about this when I buy and drink their milk, surely every year adds up to our milk being affected all the time by sadness and stress at the time of milking ?

Whose first idea of the yearly pregnancy ? Bobby? (cute name) somebody ? whoever it was, were they or he; right !! to do so, very hurtful stuff and yet I am not the mother whose child gets ripped away from her at birth each year after pregnancy and just thrown away, Please can this be at least trialled ??? even In this modern age do we still have to practice such barbaric ways

Yours sincerely (Baffled)
Joanne Rusbatch

From: Denise <[REDACTED]>
Sent: Saturday, 7 May 2016 1:33 p.m.
To: Animal Welfare Submissions
Subject: Proposed Animal Welfare Regulations. Care and Conduct:

Categories: Blue Category

To whom it may concern,

I am writing in response to the NZ governments proposed changes in animal welfare legislation.

As an animal lover and the owner of a rescue dog (found starved and close to death in a rural area) and a rescue cat, I have a particular interest in the care of domestic pets.

Of specific concerns are:

Number 3 - the provision of shaded and dry shelter for animals (specifically dogs and goats?). All animals should be provided with sturdy, weatherproof shelter if kept outdoors. Provision should be made for protection from wind, rain and sun at all times. If a lead is worn for a length of time, it should be of a decent length allowing to animal to move about freely within a reasonable, given radius. All obstacles should be removed to ensure the animal does not be entangled and distressed.

Number 4 - Pinch and prong collars are not needed in the training and control of dogs. Positive reinforcement training including the use of food rewards, halters (body and nose) and soft collars is equally effective and does not involve unnecessary pain. These collars are cruel, potentially injurious to soft neck tissue and should be banned from use. An animal which is not tethered or made to wear a collar made from potentially injurious materials (metal, rope, prongs), neck injuries would be far less likely to suffer from neck injuries.

Number 5/13 - I believe there should be strict ban on tethering ANY animal for extended periods of time, regardless of the shelter provided.

Tethering intelligent and social animals such as dogs and goats for extended periods of time is cruel and neglectful.

Independent groups such as Chained Dog Awareness NZ currently work with families (in the Auckland region) to inform, educate and in some cases enable the relinquishment and rehoming of tethered dogs. In most instances these animal are tied up for 24 hours a day with inadequate shelter and food, human contact and little or no exercise. The detrimental effects (psychological and physical) on these animals is unnecessary and unacceptable. Twenty four hour tethering of ANY animal should not be permitted under any circumstances.

Numbers 17,18,19,20 - Chickens should not, under any circumstances, be confined indoors in large numbers without extended daytime access to fresh air and open land to exercise, feed, defecate and exhibit other natural behaviours. Heavy penalties should be imposed for any breaches in the care of poultry. On a personal level, I only purchase free range eggs from a local supplier. I also only purchase free range chickens.

Numbers 23,24 - I am totally against the restraint of highly intelligent, social animals such as pigs in concrete stalls (breeding sows in particular). This treatment is barbaric and should be banned in all instances. Legislation should make provision for all pigs to have adequate shelter with room to walk about, lay down, roll over without impediment. Fresh straw, feed and water should be provided. The animals should also have regular daytime access to fresh air, open land, and be able to exhibit natural behaviours.

Number 29 - The individual purchase and personal use of fireworks should be banned and replaced by controlled public displays. Some control can be maintained by owners (ie. keeping pets indoors) on specific nights such as Guy

Fawkes, but indiscriminate use often continues throughout the summer months causing unnecessary distress to animals and their owners - sometimes resulting in injury or loss of the animal.

Numbers 43, 44, 45, 46 - Having recently witnessed the brutal treatment of bobby calves via social media, I am very concerned about the welfare of these young animals - a sad byproduct of our large dairy industry...

Firstly, all provision should be made to minimise distress to the calf and the mother during separation. Expert veterinary and animal welfare advice should be obtained regarding the most acceptable age for the calf to be taken from its mother. While waiting for transport to the abattoir, calves should be sheltered from all weathers, fed, watered. They should be HANDLED WITH CARE AT ALL TIMES. Once at the abattoir, dispatch should be quick and painless. Heavy penalties should be otherwise imposed.

Number 57 - Legislation should make it mandatory to desex all companion animals - specifically cats and dogs. Subsidised neutering/spaying should become available on a much wider, sustained basis. Education is also essential. The current (large) number of unwanted cats, kittens, puppies and dogs in NZ is evidence of the urgent need for this legislation.

In summary, I believe that the proposed updates in animal welfare legislation should be primarily concerned with the introduction, improvement and maintenance of UNIFORMLY high standards of care with regard to the ownership and treatment of all animals. To aid and enable this level of care, all SPCAs should be given increased legal authority with the ability to prosecute and uplift/remove all animal/s they deem to be suffering abuse and neglect. The current legislation around tethered dogs and goats should be immediately subject to this added authority. Additional penalties more reflective of the seriousness of each case of abuse or neglect should be introduced.

Living creatures (domestic or otherwise) are capable of experiencing pain, distress, affection and attachment and should experience high levels of care at all times. We pride ourselves on being a fair, humane society and yet our treatment of animals still leaves a lot to be desired.

I appreciate this opportunity to become involved in the process of change and improvement.

Your Sincerely,

Denise Ryan

s 9(2)(a)

From: Shelley Williams s9(2)(a) >
Sent: Friday, 13 May 2016 5:22 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Dear MPI,

I have read the documents and agree with most of the information, especially in the relation of Bobbie Calves. I would also like to make the below suggestions.

All animals whether they be livestock or domestic pets should have access to food, water, medical attention and shelter. Farms animals at the very least should have trees with overhanging branches to protect from the weather.

The transportation of live stock to any country should be banned. To keep any animal that isn't aggressive, in an enclosure for that period of time is cruel and shouldn't be happening.

Animals should not be seen as property but acknowledged in legislation as a living being or creature. I find it appalling that a Farmer for example can mistreat the animals in his care and escape prosecution by simply shooting them - which he's allowed to do. The law as it is doesn't even give Animal Welfare agencies the power to even check to see if the animal has been disposed of in a humane manner. At the very least a Vet consultation should be required and the information gathered at this appointment can then be used to continue any legal proceedings.

Hunters should be prosecuted for killing pets or in fact any animal they don't have license to kill. The Police don't see the shooting of a family pet or other animal as a priority but maybe this could be a shared responsibility between MPI and NZ Police.

Landlords of tenants who abandon their pets by leaving them in the leased property when they move should be made liable, if the former tenant cannot be contacted - the Landlord or Tenancy Tribunal should be made, by law to share this information or be held responsible. At present abandoning an animal is a breach of the current Animal Welfare Act but no-one is being held accountable - so it's pointless.

All animal shelters privately owned, and others including the SPCA and Pet Stores should be providing statistics to MPI and have routine operational and centre checks. All mean well but some, left unchecked aren't providing the best care for the animals and as a result some are suffering needlessly or even dying. Usually because the Animal and Centre or Shop Managers aren't qualified professionals and/or the agency is trying to cut costs so animals aren't getting vet treatment until the illness is advanced. The reality of these places is that they are giving the animals a place better than the streets but sometimes, not by much.

The keeping of animals by local councils animal control departments also needs reviewing. All animals unless aggressive or feral should be locked up all day in a cage. The cages are even being cleaned - with a high pressure hose - while the animal is still in it. Dogs don't receive blankets. Some cages are high off the ground with wire floors which is terrifying for the animals. Not humane treatment at all.

I propose laws regarding fostering animals also. Home visits, audits and a care plan given to them. Some type operating procedure that needs to be followed.

Uncontrolled dog breeding shouldn't be allowed. There are too many dangerous breeds being bred or breeds mixed together that shouldn't be. Anyone with the intention of breeding a dog must register with their local council or face fines or having their dog removed.

Thats all.

Thank you so much for your time and for reviewing the current legislation. As the current law is not adequate.

It would also be great if places like the SPCA could pick up government contracts and get paid for the service they provide. Much like NGOs do with MSD.

Regards

Shelley Williams

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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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From: Delores van Niekerk <[REDACTED]>
Sent: Friday, 13 May 2016 6:16 p.m.
To: Animal Welfare Submissions
Subject: CRUELTY TO ANIMALS

To the Ministry of Primary Industries,

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

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

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

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

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

I would like to you to ban the use of exotic animals in circuses that too is so cruel and they are treated cruelly as well after shows. There is ample evidence that these animals suffer in captivity, and there is no reason to allow that suffering for entertainment purposes.

I was also shocked to see at some Farm in New Zealand where baby calves were taken from their mothers minutes after their births, hardly even barely able to stand, taken and thrown into a van and taken to be kicked around hit with sticks and killed, I have seen the poor mother running after her calf taken from her minutes after it was born with the after birth still dangling from her abdomen, that was traumatising not only to me but to the poor mother and baby calf as well and so very cruel...

I cannot believe that there are people in this world that do such cruel things to baby animals not even quite in this world yet. Why are these people doing such cruel things..... Please stop this cruelty....do something about it please Ban all cruelty to all animals please. These poor animals cannot speak for themselves they cannot tell you they are hurting and hungry and thirsty it's so cruel please open your hearts to these poor animals.

Stop the killing and keeping animals in cages they can hardly move in, animals should be free like God intended them to be...

*Thank you Kindly
Delores Van Niekerk*

"To give us feedback on our service levels, please email your comments to § 9(2)(a) [REDACTED]"

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§ 9(2)(a) [REDACTED]