



Animal welfare regulations

Summary report on public consultation April /
May 2016

MPI Information Paper No: 2017/02
Prepared for the Ministry for Primary Industries

ISBN No: 978-1-77665-513-7 (online)
ISSN No: 2253-394A (online)

2017

Disclaimer

While every effort has been made to ensure the information in this publication is accurate, the Ministry for Primary Industries does not accept any responsibility or liability for error of fact, omission, interpretation or opinion that may be present, nor for the consequences of any decisions based on this information.

Requests for further copies should be directed to:

Publications Logistics Officer
Ministry for Primary Industries
PO Box 2526
WELLINGTON 6140

Email: brand@mpi.govt.nz
Telephone: 0800 00 83 33
Facsimile: 04-894 0300

This publication is also available on the Ministry for Primary Industries website at <http://www.mpi.govt.nz/news-and-resources/publications/>

© Crown Copyright - Ministry for Primary Industries

Contents

Page

Purpose	4
What to expect in this document	4
Section 1 - Introduction and overview	5
Background	5
Where did the regulatory proposals come from?	5
The process to identify potential proposals	6
Who is affected by the proposed regulations?	7
Section 2: Summary of public consultation	7
The consultation process	7
The numbers	8
Summary of submissions	8
Section 3: Progress and next steps	11
Progress to date	11
Next steps	12
Appendix A: Written submissions on “Care & Conduct and Surgical and Painful Procedures” proposals – excluding the young calf proposals	13
Appendix B: Summary of submissions on the “Young Calf” proposals	50
Appendix C: Summary of submissions on “Transport of live animals from New Zealand” proposals	54
Appendix D: Summary of public meetings	56
General Questions	56
Care and Conduct Proposals – excluding young calf proposals	61
Care and Conduct Proposals – young calf proposals	80
Surgical and Painful Procedure Proposals	84
Live Animal Exports Proposals	100
Appendix E: List of groups and individuals who provided submissions during consultation	101
Organisations and Associations	101
Individuals	103
Appendix F: Specific proposals to be progressed	118
Regulatory projects to be progressed in 2017	118
Regulatory projects to be progressed in 2018	119

Purpose

This document provides a summary of views expressed during 2016 consultation on proposed animal welfare regulations under the Animal Welfare Act 1999 (the Act).

Consultation relates to proposals outlined in:

- *MPI Discussion Paper No: 2016/12: Proposed Animal Welfare Regulations: Care & Conduct and Surgical and Painful Procedures.*
- *MPI Discussion Paper No: 2016/13: Proposed Regulations for the Transport of live animals from New Zealand.*

What to expect in this document

This summary report is divided into three sections:

- *Section 1: - Introduction and overview*—an overview of how and why the regulations were developed.
- *Section 2: - Summary of public consultation*—an overview of the consultation process and submissions received. Detailed summaries of the submissions on each proposal are attached as appendices:
 - Appendix A: Summary of submissions on “Care & Conduct and Surgical and Painful Procedures” proposals – excluding the young calf proposals
 - Appendix B: Summary of submissions on “Care & Conduct and Surgical and Painful Procedures” proposals – young calf proposals only
 - Appendix C: Summary of submissions on “Transport of live animals from New Zealand” proposals
 - Appendix D: Summary public meetings
 - Appendix E: List of groups and individuals who provided submissions during consultation.
- *Section 3: - Progress and next steps*—an overview of actions taken to date and how the proposed regulations will be progressed. The timeline for progressing the individual proposals is outlined in the appendices.
 - Appendix F: Specific proposals to be developed and proposals that will not be developed at this time.

Section 1 - Introduction and overview

Background

The Act was reviewed during 2011/12 to ensure that New Zealand's animal welfare system was fit for purpose. The review identified problems with enforceability, clarity and transparency of the Act¹. Analysis of different options to address these concerns identified that regulations would best address problems related to enforceability and clarity.

As a result of the review, the Act was amended and now has powers to make regulations in relation to:

- standards for the care of, and conduct towards, an animal;
- surgical and painful procedures; and
- live animal exports.

The proposed regulations complement codes of welfare by specifying directly enforceable animal welfare standards and providing clarity on the performance of surgical and painful procedures. They also enhance the welfare of animals being exported from New Zealand and further protect our reputation as a responsible exporter of animals and products made from animals.

Where did the regulatory proposals come from?

Care and conduct / surgical and painful procedures

Parts 1 and 2 of the Act set out obligations for the care of, and conduct towards, animals. For example, the Act obliges the owner, or the person in charge of an animal to ensure that the animals' physical, health and behavioural needs are met in accordance with good practice and scientific knowledge. The Act also obliges the owner or person in charge of an ill or injured animal to ensure that the animal receives treatment to alleviate any unreasonable or unnecessary pain or distress and places restrictions on the procedures that may be performed on animals.

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

Most of the proposed regulations are based on existing minimum standards within codes of welfare and do not represent a significant change in requirements. However a small number change current practice or requirements. The minimum standards within codes of welfare reflect good practice, scientific knowledge, and available technology at the time when they were developed. During the development of the regulatory proposals the question of whether the standards for particular practices needed to be updated was considered. The proposals that updated practice, beyond minor changes, primarily related to the performance of surgical and painful procedures and the management of young calves.

Live animal exports

Part 3 of the Act relates to live animal exports. This part of the Act seeks to protect the welfare of animals being exported from New Zealand, and to protect New Zealand's reputation as a responsible exporter of animals and products made from animals. The Act requires that all live animals be exported under the authority and in accordance with the conditions of an Animal Welfare Export

¹ For further information see "Options to Amend the Animal Welfare Act 1999. Regulatory Impact Statement (2013)". <http://www.mpi.govt.nz/law-and-policy/legal-overviews/regulatory-impact-statements/>

Certificate (AWEC) issued by the Director-General of the Ministry for Primary Industries (MPI), unless exempt under law².

The proposals sought to bring into force, via a commencement order, new provisions of the Animal Welfare Act. These provisions set out the matters the Director-General must or may have regard to when considering an application for an AWEC and the conditions they may impose on an AWEC. The provisions were consulted on during the development of the Animal Welfare Amendment Act 2015. Public consultation was therefore focused on the intention to bring forward the commencement of these provisions to the end of 2016, rather than waiting for these to commence automatically in May 2020³.

The proposals also sought to bring the existing conditional prohibition on the export of cattle, sheep, deer and goats (collectively referred to as livestock) for slaughter under the jurisdiction of the Animal Welfare Act. Since 2007 the conditional prohibition has been implemented through a Customs and Excise Prohibition Order. To consolidate animal welfare matters under the Animal Welfare Act placing the prohibition in animal welfare regulation was publicly consulted on during the development of the Animal Welfare Act. Consultation on the regulatory proposal was therefore focused on bringing the regulation into force in the second half of 2016.

The process to identify potential proposals

Care and conduct / surgical and painful procedures

Approximately 1200 minimum standards or requirements in codes of welfare were considered against the following criteria to determine which ones would be suitable to develop into regulatory proposals.

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

In developing the proposals MPI drew on the knowledge and experience of a joint working group⁴ and targeted stakeholder workshops. The joint working group reviewed the minimum standards in all the codes of welfare (and draft codes). In addition, some matters were identified that were not covered, or not adequately covered, by minimum standards and were included within the review.

² Currently exemptions apply to certain animals, where the travel time from the New Zealand port of departure to the port of arrival does not exceed 6 hours, for example, cats, dogs, goats and sheep. Several other animals are also exempt irrespective of their travel time, for example, cats and dogs to Australia, crabs, crayfish, fish, lobster, octopus, squid, and poultry hatching eggs (being avian pre-hatched young in the last half period of development). For a full list of exemptions refer <http://www.mpi.govt.nz/>.

³ Under the Act these provisions will come into force 5 years after the date on which the Amendment Act received Royal Assent (i.e. 2020) or on an earlier date appointed by Order in Council through a commencement order.

⁴ The joint working group consisted of representatives from the National Animal Welfare Advisory Committee (NAWAC), MPI, the Royal New Zealand Society for the Prevention of Cruelty to Animals (RNZSPCA) and the Veterinary Council of New Zealand (VCNZ)

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

MPI analysed the information collected during these discussions and identified the areas where regulations were considered the most appropriate mechanism to address the issues raised by the Act review. Those areas were developed further into regulatory proposals and publicly consulted on during April and May 2016.

Who is affected by the proposed regulations?

The submissions and comments, summarised in this document, provide valuable insight on who is affected by the proposed regulations, how and to what extent.

Care and conduct / surgical and painful procedures

The proposed regulations directly affect almost everyone who either owns or is in charge of animals and those that care for animals as part of their work. This includes pet owners, people on lifestyle blocks, stock transport operators, meat processors, stock and station agents and those working on large commercial farms. However, because many of the regulations reflect existing minimum standards, the majority will not require people who already look after animals well to change their current practice.

Some of the proposed regulations are different, either in being more specific than the current minimum standard or updating current requirements to a higher standard. In these situations the owner or person in charge of an animal may be affected, depending on their current practice.

Live animal exports

The proposals affect anyone wanting to export live animals. The Act requires that all live animals be exported under the authority and in accordance with the conditions of an Animal Welfare Export Certificate (AWEC) issued by the Director-General of the Ministry for Primary Industries (MPI), unless exempt under law.

Section 2: Summary of public consultation

The consultation process

MPI consulted on 91 animal welfare regulatory proposals over a five week period during April and May 2016. The regulatory proposals were outlined in the following discussion documents:

- *MPI Discussion Paper No: 2016/12: Proposed Animal Welfare Regulations: Care & Conduct and Surgical and Painful Procedures.*
- *MPI Discussion Paper No: 2016/13: Proposed Regulations for the Transport of live animals from New Zealand.*

Consultation included six public meetings throughout New Zealand and an invitation to all interested parties to provide written submissions on the discussion documents. The public meetings were held in Wellington, Palmerston North, Auckland, Hamilton, Invercargill and Christchurch.

Eight of the proposals were specifically designed to address the welfare of young calves. These proposals were fast tracked to ensure they were in place for the majority of the 2016 bobby calf

season. To achieve this, MPI also held a number of bi-lateral discussions with industry groups most likely affected by any new regulations at the completion of the public consultation.

The numbers

MPI received over 1400 submissions on the proposals relating to Care and Conduct, Significant and Painful Surgical Procedures and Live Animal Exports. Approximately 1000 submissions were from individuals and 400 submissions were from organisations.

While a large amount of submitters presented their own submission on the proposed regulation, there were a significant number of ‘form submissions’ – submissions which are, essentially, copy and pasted and sent by multiple people as individual submissions.

The most prevalent form submission was constructed by SAFE (Save Animals From Exploitation) and submitted by approximately 600 different individuals. This form submission commented on proposals relating to layer hens, farrowing crates, rodeos, exotic animals in circuses and general comments on the practice of factory farming.

Summary of submissions

Overall the majority of submissions supported the regulatory proposals or requested stronger regulations. The information provided in the submissions will be used to refine the proposals and inform the assessment of potential impacts.

Detailed summaries of the submissions on each proposal are attached as appendices:

- Appendix A: Summary of submissions on “Care & Conduct and Surgical and Painful Procedures” proposals – excluding the young calf proposals
- Appendix B: Summary of submissions on “Care & Conduct and Surgical and Painful Procedures” proposals – young calf proposals only
- Appendix C: Summary of submissions on “Transport of live animals from New Zealand” proposals
- Appendix D: Summary of public meetings
- Appendix E: List of groups and individuals who provided submissions during consultation

Contentious issues raised

There were some areas of contention which came out through public consultation:

- Length of consultation period;
- Dogs’ tails;
- Pain relief and paraprofessionals;
- Stock transport;
- Colony cages for layer hens; and
- Pigs.

Length of consultation period

MPI consulted on the regulatory proposals for a five week period during April and May 2017. There was considerable comment, during the public meetings and in the written submission process, that the consultation period was too short and did not provide stakeholders enough time to adequately consider the proposals.

The five week timeframe was driven by the need to ensure regulations were in place to protect the welfare of young calves prior to the bulk of the spring calving season in August 2016. Once the

young calves and live animal exports regulations had been delivered, MPI allowed affected parties an additional opportunity to provide supplementary information on any of the remaining proposals where they had felt disadvantaged by the initial timeframe and a number of submitters took that opportunity.

Dogs' tails

The proposal to prohibit the docking of dogs' tails (except to respond to disease or injury) was one of the most contentious proposals consulted on. Approximately 76% of written submissions on this point opposed the proposal in its entirety or asked for weaker regulation in the area.

The majority of submitters who opposed the proposal were dog breeders, or advocates of purebred dogs. They believe that tail docking is a preventative measure against the risk of injury and therefore performed in the best interests of the animal. Many dog breeders said that in their experience neonate puppies (up to four days old) show little or no pain when the procedure is performed. Additionally, they believe the procedure does not amount to a surgical procedure, particularly when suitably trained breeders use the 'tail banding' method on neonate puppies.

The majority of submitters who supported the proposal were veterinarians and animal welfare advocates, including the Royal New Zealand Society for the Prevention of Cruelty to Animals (SPCA). These submitters did not agree with tail docking for aesthetic reasons or as a measure to prevent injury. They contended that the risk of tail injury is over-stated and therefore the procedure is unnecessary, particularly because in their view tails have a function in terms of balance and communication with other dogs and humans. They also point to the significant welfare issues that arise when tails are docked by inexperienced laypeople.

Pain relief and paraprofessionals

A number of the proposals consulted on drew from the Animal Welfare (Painful Husbandry Procedures) Code of Welfare 2005 in identifying appropriate enforceable standards for the regulation of surgical and painful procedures performed on animals.

Eleven of the proposals require either pain relief to be used and/or relate to situations where 'paraprofessionals' currently undertake the procedure. In the context of this document, a paraprofessional is a non-veterinarian who is skilled and experienced at undertaking specific technical procedures. The following table sets out what these proposals are:

Six proposals enable the procedure and the pain relief to be undertaken by a non-veterinarian.
<ul style="list-style-type: none">• disbudding: disbudding is the destruction, by any method, of the free-floating immature horn tissue (horn 'buds' growing from the skin') from which the horns of an animal subsequently develop.• dehorning: the removal of whole horns (including any regrowth after disbudding) from an animal by amputation.• deer develvetting: the removal of deer antler velvet. Deer antler velvet is the phase of antler development when the antler is 'live' and still has blood vessels and nerves running through it. This procedure is conducted under veterinary supervision through an accredited programme run by the National Velveting Standards Board.• dubbing: the procedure of removing the comb, wattles and sometimes earlobes of poultry.

<ul style="list-style-type: none"> • laparoscopic artificial insemination: a technique to assist breeding where semen is directly deposited into each of the uterine horns. • embryo transfer: a technique to assist breeding where the uterus is pulled out through an incision in the side of an animal so that the embryo can be washed and collected.
Two proposals require the procedure and pain relief to be undertaken by a veterinarian or veterinary student: ⁵
<ul style="list-style-type: none"> • liver biopsies: this is a surgical procedure where a needle is inserted into the body of an animal to take a sample from the liver for nutritional and health assessments. • caslick's procedure: the surgical closing of the upper part of the vulva in mares. It is undertaken to avoid faecal contamination and consequent infection and inflammation, in order to maintain a horse's reproduction
Two proposals do not require pain relief to be used but must be undertaken by a veterinarian or veterinary student ⁶ .
<ul style="list-style-type: none"> • rectal examination in horses • rectal pregnancy examinations in horses <p>This is because a horse's rectum is more prone to injury than other animals. Veterinary experience is needed to ensure that any problems that do arise can be responded to appropriately and efficiently.</p>
One proposal clarifies the types of dental tools that can be used on animals.
<ul style="list-style-type: none"> • The use of power tools for dental work

A number of these proposals would enable a non-veterinarian to undertake the relevant procedure provided that a veterinarian authorised and oversaw use of pain relief. In most cases the pain relief required by the proposed regulations will be a Restricted Veterinary Medicine (RVMs). The proposals also generally specify who can undertake the procedure and, in the case of animal dentistry, how.

The most contentious proposals were the requirements for pain relief during disbudding and dehorning, the narrow scope of the animal dentistry proposal, and the lack of specificity about who can undertake technical procedures such as laparoscopic artificial insemination and embryo transfer.

The common criticism of these proposals was that pain relief is not necessary in all circumstances, the need to ensure equitable and cost-effective access to pain relief for non-veterinarians and that there would need to be considerable upskilling of personal undertaking these procedures.

Support for the proposals varied within industry and across the non-industry stakeholders. Those supporting the proposals generally noted the need for a lead in time to implement the proposals to allow time to upskill operators and to develop the relationships and systems necessary to facilitate the use of RVMs for some of the procedures.

⁵ Under the direct supervision of a veterinarian.

⁶ Under the direct supervision of a veterinarian.

Stock transport

The proposals relating to stock transport target areas which are frequently recorded as issues by MPI's veterinarians at meat processing plants. While most farmers, transporters, stock agents and meat processing companies agree that regulations in this area are required, they expressed differing views as to who within the supply chain should be held responsible.

The two most contentious proposals were transporting lame stock and stock in late pregnancy. The concern was that the degree of lameness and stage of pregnancy require some subjective judgment and submitters held divergent views about what thresholds should be acceptable.

Approximately 90% of submitters supported or wanted a stronger position for the two lame stock proposals. Some requested higher penalties and some that transport of lame animals be prohibited.

Pigs and Layer hens

The proposals relating to pigs attracted over 700 submissions—the majority were a form submission presented by advocacy group SAFE expressing general opposition to the use of farrowing crates, colony cages and calling for the removal of all 'factory farming' regulations, and for MPI to undertake a review of 'factory farming'. Of the remaining submitters who commented specifically on the proposals, both farmers and industry groups including NZ Pork and the Egg Producers Federation were generally supportive of the intent and rationale behind the proposals.

Section 3: Progress and next steps

Progress to date

Public consultation on the 91 regulatory proposals relating to the care of, and conduct towards animals, surgical and painful procedures and live animal exports concluded in May 2016.

Progressing proposals relating to young calves

The care and conduct proposals included a number of proposals specific to the management of young calves. A young calf is defined as a bovine that is up to 14 days of age and has been separated from its mother.

MPI prioritised progressing the young calf regulations to have them in place before the bulk of the 2016 spring calving season. Four regulations took effect on 1 August 2016. They relate to:

- Prohibiting the killing of any calf by the use of blunt force trauma, except in an emergency situation;
- Prohibiting transport of young calves by sea across Cook Strait;
- Requiring calves to be at least four full days of age and physically fit before being transported off farm for sale or slaughter or as a result of sale, and
- Limiting the total time a calf can be transported from loading to final destination to a maximum of 12 hours.

Another regulation took effect on 1 February 2017 which requires that calves must be slaughtered as soon as possible after arrival at the slaughter premises or be fed if not slaughtered within 24 hours of the last feed on farm. If calves are unwilling and unable to feed, they must be euthanised or slaughtered immediately.

The final two regulations relating to young calves will take effect on 1 August 2017. These:

- Require that suitable shelter be provided for young calves before and during transportation, and at points of sale or slaughter; and

-
- Require loading and unloading facilities be provided and used when young calves are transported for sale or slaughter or as a result of sale.

Progressing proposals relating to live animal exports

A commencement order and regulations, relating to live animal exports, have also been progressed. The Animal Welfare (Export of Livestock for Slaughter) Regulations 2016, made in August 2016, brought the existing conditional prohibition on the export of livestock for slaughter under the jurisdiction of the Animal Welfare Act.

The Animal Welfare Amendment Act (No 2) 2015 Commencement Order 2016 brought new provisions under the Act into force on 25 August 2016, rather than waiting for them to commence automatically in May 2020. These new provisions set out the matters the Director-General must or may have regard to when considering an application for an AWEC and the conditions that he or she may impose on an AWEC.

Progressing all remaining animal welfare regulatory proposals

MPI has now summarised and analysed the submissions on the remaining care and conduct and surgical and painful procedure regulations. This information is contained in this document.

Next steps

Development of the remaining regulatory proposals have been divided into two packages. The first package of proposals have been prioritised for development in 2017 as they will deliver the most immediate animal welfare benefits. They relate to:

- Stock transport;
- Farm husbandry;
- Companion and working animals;
- Pigs and layer hens;
- Crustaceans; and
- Rodeos.

In 2018, the second package of regulations will be progressed. This package will address the implications of new criteria in the Animal Welfare Act 1999, which will define Significant Surgical Procedures when they come into force in 2020. These regulations will clarify the rules around who may undertake surgical and painful procedures on animals and under what circumstances.

The specific proposals in each package are outlined in Appendix F. At this stage a small number of proposals are not included in either package, some of these proposals require further consideration and others may not progress at this time.

Appendix A: Written submissions on “Care & Conduct and Surgical and Painful Procedures” proposals – excluding the young calf proposals

(The proposals consulted on were included in “MPI Discussion Paper No: 2016/12: Proposed Animal Welfare Regulations: Care & Conduct and Surgical and Painful Procedures”)

The following broad groups were used to categorise the submissions received. These categories are used in the pie graphs and discussion in the following tables:

- Support = Expresses support for the proposal as it is.
- Stronger = Comments on the proposal, suggests a stronger wording or penalty, or more or stronger regulation in the general area.
- Weaker = Comments on the proposal, suggests a weaker wording, lower penalty, or less regulation in the general area.
- Oppose = Opposes proposal - may either prefer no regulation/status quo or may only state opposition to proposal without mentioning what they might like instead.
- DNC = Does not comment directly on the proposal - this will include where general comment that stronger regulations are required but there has been no specific comment on the proposal itself.

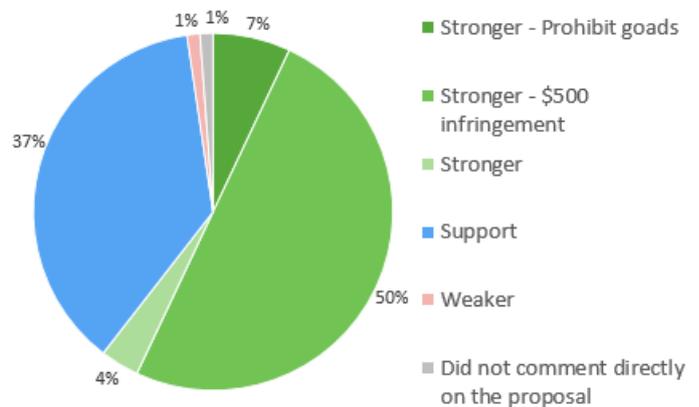
Care and Conduct Regulatory Proposals

1. Electric prodder use (95 submissions)															
<p><i>Proposal:</i> Electric prodders may only be used on:</p> <ol style="list-style-type: none"> 1. Cattle over 100kg; 2. Cattle over 100kg and other animals in a circus where the safety of the handler is at risk; or; 3. Cattle over 100kg, and other animals, in a commercial slaughter premises: <ol style="list-style-type: none"> i. Where the safety of the handler is at risk; ii. When loading a stunning pen. 															
<ul style="list-style-type: none"> • No submissions opposed regulation in this area. • The vast majority supported the regulation as worded or asked for stronger wording. • The most common stronger position requested prohibiting electric prodders except to protect the safety of handlers. This was followed by outright prohibition. Other stronger positions included no exceptions for circuses, rodeos, or slaughterhouses. • Submissions asking for weaker wording requested allowing use on more animal species (most commonly large pigs), providing a more general safety exception, or allowing wider use when loading stock trucks. 	<table border="1"> <caption>Pie Chart Data</caption> <thead> <tr> <th>Category</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Stronger - Prohibit electric prodders</td> <td>16%</td> </tr> <tr> <td>Stronger - Prohibit except for safety</td> <td>40%</td> </tr> <tr> <td>Stronger</td> <td>14%</td> </tr> <tr> <td>Support</td> <td>23%</td> </tr> <tr> <td>Weaker</td> <td>6%</td> </tr> <tr> <td>Did not comment directly on the proposal</td> <td>1%</td> </tr> </tbody> </table>	Category	Percentage	Stronger - Prohibit electric prodders	16%	Stronger - Prohibit except for safety	40%	Stronger	14%	Support	23%	Weaker	6%	Did not comment directly on the proposal	1%
Category	Percentage														
Stronger - Prohibit electric prodders	16%														
Stronger - Prohibit except for safety	40%														
Stronger	14%														
Support	23%														
Weaker	6%														
Did not comment directly on the proposal	1%														

2. Use of goads on sensitive areas (86 submissions)

Proposal: Prohibit using a goad to prod an animal in the udder, anus, vulva, scrotum or eyes.

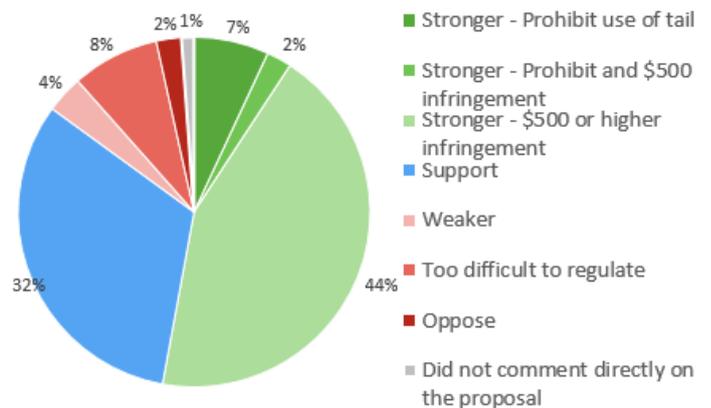
- No submissions opposed regulation in this area.
- The vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested a higher penalty of \$500 as the act was seen as deliberate. This was followed by outright prohibition. A number also suggested broadening the range of areas covered and/or including hands as well as goads.
- The submissions asking for weaker wording requested the offence be only for 'deliberate' acts.



3. Twisting an animal's tail (87 submissions)

Proposal: Prohibit twisting an animal's tail in a manner that causes the animal pain

- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested a higher penalty of \$500 or more as the act was seen as deliberate. This was followed by outright prohibition on using the tail.
- A number of submitters considered that the offence cannot be worded clearly enough for an infringement, is not serious enough for prosecution, and therefore is not suitable for regulation.
- Submissions asking for weaker wording either requested the offence be for causing 'severe pain' or for the use of the tail to be allowed to protect human health and safety.

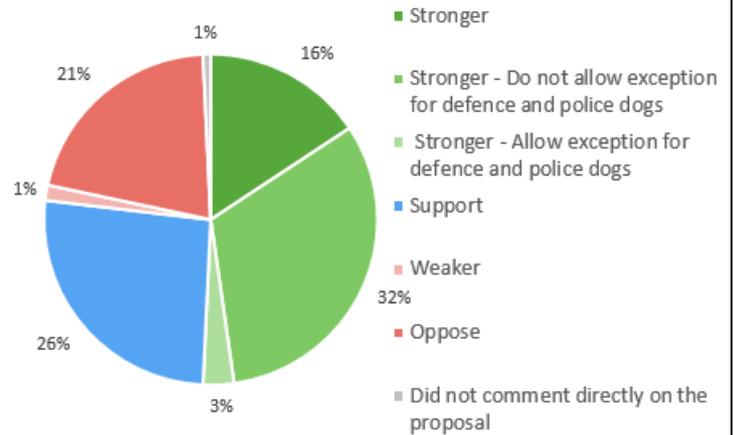


4. Dogs – Pinch and prong collars (134 submissions)

Proposal: Prohibit the use of pinch and prong collars

Proposed change to definition: A collar with prongs positioned against the neck, or any other protrusion intended to cause pain or discomfort when tightened

- The vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested the sale of pinch and prong collars to be prohibited as well.
- The second group of submitters requesting stronger wording did not want an exception for pinch and prong collars to be acceptable for use with police or defence dogs.
- The most common opposition to the regulation came from dog trainers working with high drive working class dogs.
- A strong theme in the submissions from all sides was the need to look into electric collars and/or choke collars as they were perceived to be as much of a problem (or worse).

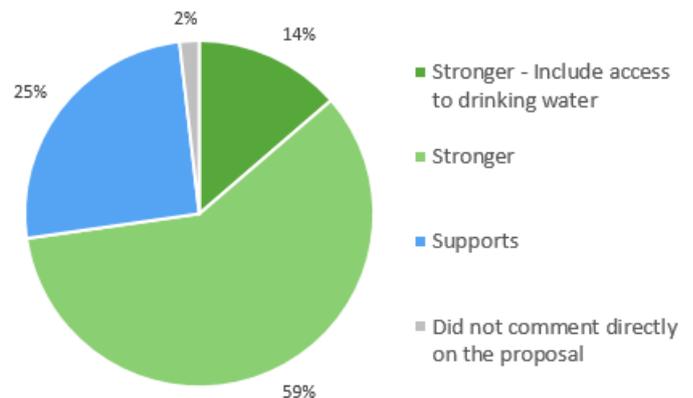


5. Dogs – Injuries from collars or tethers (110 submissions)

Proposal: Use of a collar, and/or a tether, must not cause cuts, abrasions, swelling, restrict breathing or panting.

Links to goat and horse tethering, links to dog muzzling, access to shade and dry sleeping quarters, and heat stress in vehicles.

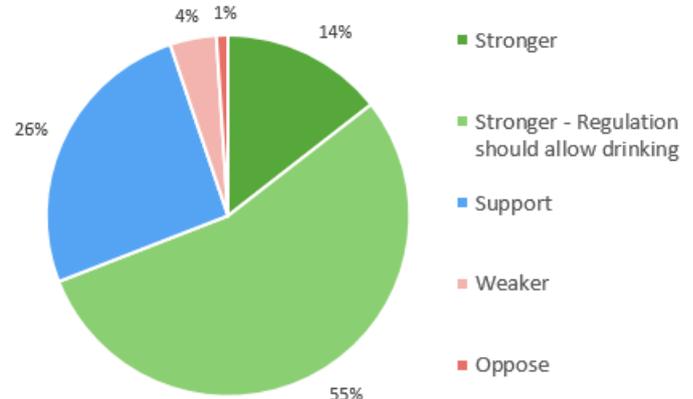
- No submissions opposed regulation in this area.
- The vast majority supported the regulation as worded or asked for stronger wording.
- Suggestions for stronger wording included the extension of the regulation to all animals, followed by access to drinking water.
- A number of submitters considered that there should be a time limit applied to the period a dog can be tethered. The time limit identified as appropriate was given as 8 hours.



6. Dogs – Muzzling a dog (97 submissions)

Proposal: Muzzling a dog must not cause cuts, abrasions, swelling, or restrict breathing and must allow panting.

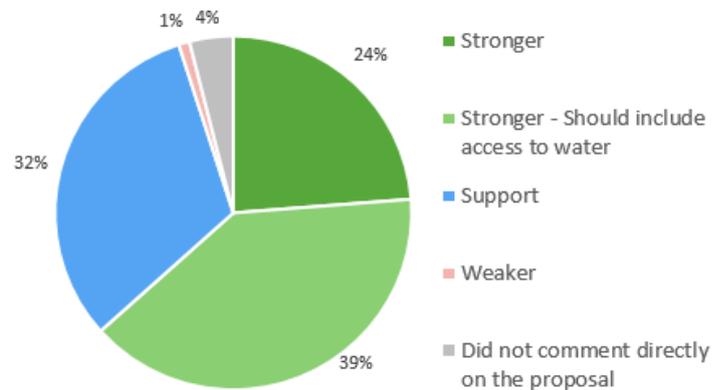
- The vast majority supported the regulation or asked for stronger wording.
- The most common stronger position requested that the regulation be extended to allow a dog to drink when muzzled.
- A number of submitters put forward scenarios where tight muzzling will be necessary. These included veterinary examinations to prevent an anxious dog from biting, or muzzling captured dangerous dogs.
- The single submitter opposed to the regulation thought there were low complaints in the area, and responsible owners are always careful in the treatment of their dogs.
- A strong theme in the submissions was the need to ensure dogs were not left unattended while muzzled.



7. Dogs – Dry and shaded shelter (101 submissions)

Proposal: Dogs confined to an area where they are habitually kept must have access at all times to a fully shaded and dry area for resting and sleeping.

- The vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested that the regulation require access to palatable water.
- This was followed by submitters requesting the regulation include a maximum period that a dog can be restricted to a kennel or tether – especially on a sunny day with no shade.
- Industry organisations supported the regulation but submitted that there would be situations where this would be difficult to apply – such as extreme weather events, or overnight mustering.

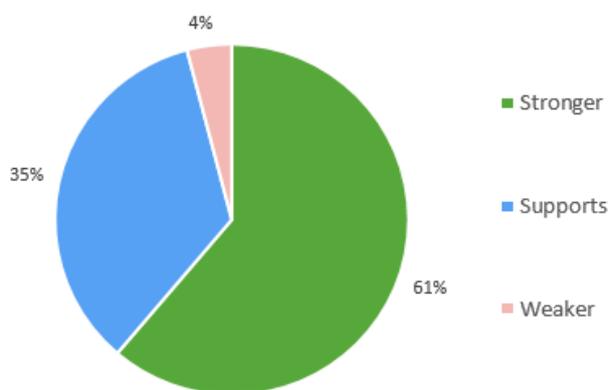


8. Dogs – Dogs left in vehicles (102 submissions)

Proposal: A person leaving a dog in a vehicle must ensure the dog does not display symptoms consistent with heat stress such as any or a combination of:

1. Hyperventilation;
2. Excessive panting;
3. Excessive drooling;
4. Lethargy, weakness, or collapse; and
5. Non-responsive to attempt to check a dog's alertness

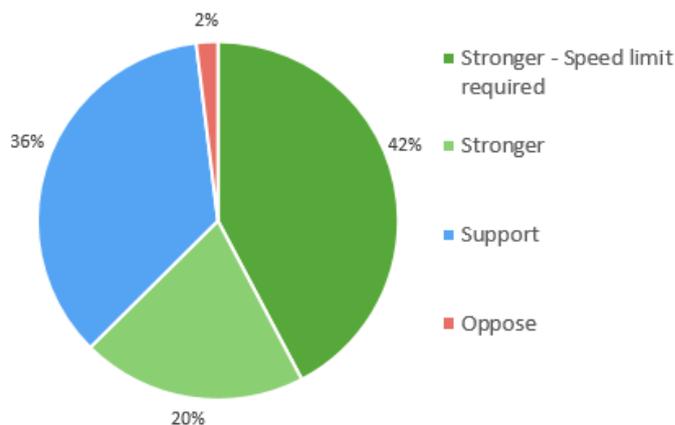
- The vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested for the penalty to be a prosecutable regulation offence.
- Most industry organisations submitted that this should remain an infringement offence to allow more serious cases to be prosecuted under the Act.
- A strong theme in the submissions was a concern that the listed symptoms were too broad, and left too much up to interpretation by people who were not specialists in breed types or behaviours.
- Submitters opposed to the regulation thought that this would not be a deterrent to offending, and that education would also need to accompany the regulation to be effective.



9. Dogs – Secured on moving vehicles (104 submissions)

Proposal: Dogs on moving vehicles on public roads must be secured in a way that prevents them from falling off, except for working dogs which may be unsecured on a vehicle while working.

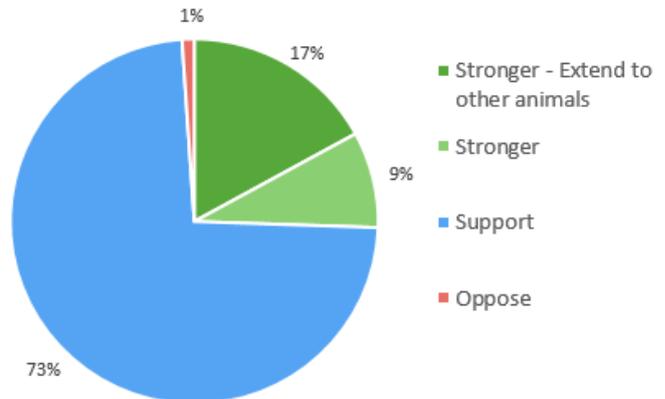
- The vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested a maximum speed limit to be set for when a dog is on a moving vehicle. The most common speed limit given was 40km/h for vehicles carrying unsecured working dogs.
- Another large group of submitters wanted to see the regulation extended to dogs unsecured on private property to include working dogs.
- A number of submitters showed concern with the ability to enforce the regulation, and that animal welfare inspectors would need stronger enforcement powers for it to make a difference.
- Farming industry organisations supported the regulation as it recognised common farm practice. Advocacy and Veterinary organisations thought the regulation could be stronger in terms of working dogs, but most accepted the exception due to farm practice.



10. Dogs & Cats – Drowning dogs & cats (94 submissions)

Proposal: Prohibit the killing of a cat or dog, of any age, by drowning.

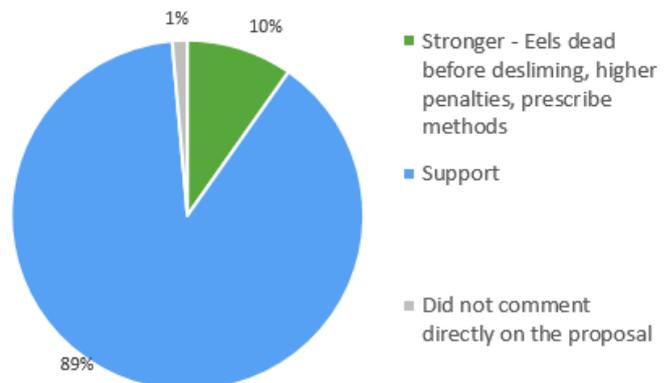
- The majority supported the regulation.
- Of those who supported the regulation, a majority supported the penalty being set as a prosecutable regulation offence.
- A number of submitters were concerned about the possible 'downgrading' of the already existing offence under the Act. A number of submitters also thought the regulation should be extended to other animals and mammals.



11. Eels –insensible for desliming (72 submissions)

Proposal: Eels must be insensible for the duration of desliming, or be killed before they are deslimed.

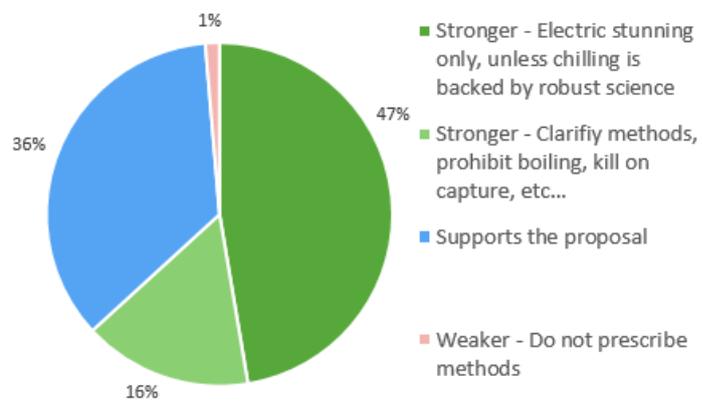
- No submissions opposed regulation or requested weaker wording in this area.
- The majority supported the regulation as worded.
- The most common stronger position requested that eels are killed before desliming rather than be insensible. Other stronger positions asked for higher penalties or defining and prescribing the methods to be used.



12. Crabs, rock lobster, and crayfish – insensible before being killed (76 submissions)

Proposal: Crabs, rock lobster, and crayfish that are captured but not imminently destroyed, must be chilled to 4 °C or less, or be electrically stunned, or be otherwise rendered insensible before being killed.

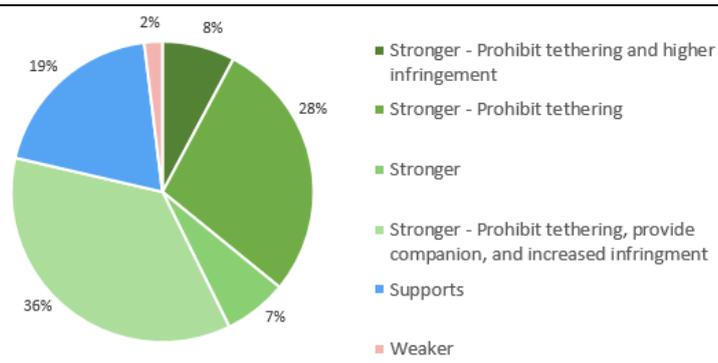
- The majority supported the regulation or asked for stronger wording.
- The most common stronger position requested that only electrical stunning be permitted unless robust science supported chilling as effective. Other stronger positions questioned other methods of rendering insensible, suggested an explicit prohibition on boiling alive, or that all crustaceans should be killed on capture.
- A submission requested that methods of rendering insensible are not prescribed.



13. Goats – Tethering requirements (103 submissions)

Proposal: Tethered goats must have constant access to food, water, and shelter.

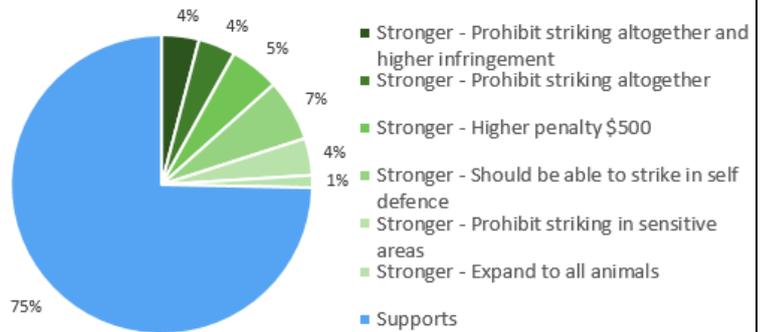
- No submissions opposed regulation in this area.
- About a quarter of submitters supported the regulation as worded.
- A majority of submitters opposed the concept that goats should be allowed to be tethered permanently, and that the infringement fine should be higher.
- Submissions asking for stronger wording requested for goats to be provided with a companion animal.
- Many submitters argued that goats are not lawn mowers, they are very social animals that need more food than just grass, and should be provided with appropriate shelter. Tethering goats did not meet their needs.



14. Horse – Use of a whip, lead or any other object (75 submissions)

Proposal: Prohibit striking a horse around the head with a whip, lead or any other object.

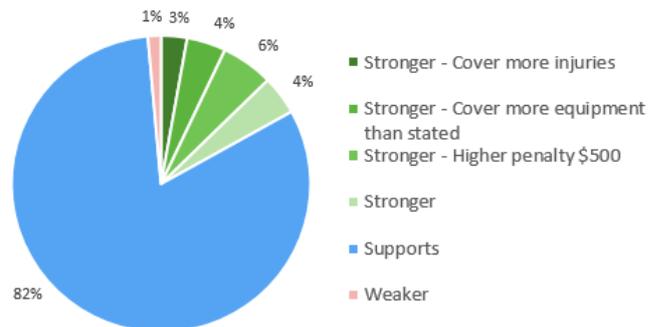
- The majority supported the regulation as worded.
- A common stronger position proposed that a horse should not be hit in any area at all with a whip or a lead as it will cause distress. This was followed by the request that this regulation include striking the horse in the genitals or sensitive areas.
- A number of submitters requested that this regulation should expand to all animals.
- Submissions asking for weaker wording requested that there be an allowance to strike a horse in the interest of self-defence.
- A large number of submitters believed the infringement fine should be higher.



15. Horse – Injuries from equipment such as halter, head ropes, and saddles. (71 submissions)

Proposal: The use of halters, head ropes, saddles and other equipment must not cause cuts, abrasions, or swelling.

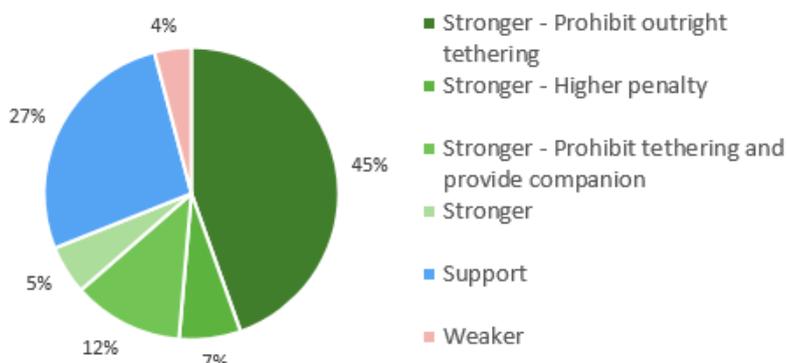
- The vast majority supported this regulation as worded.
- A small number of submitters called for a higher infringement fine.
- It was suggested that the regulation should include the removal of equipment when it is not being used, as well as bruising and pinching to be included as an injury.
- Recommended that the definition of equipment include twitched, tack and mouth gags.



16. Horses and donkeys – Tethering requirements (73 submissions)

Proposal: Tethered horses and donkeys must have constant access to water, food, and shelter.

- The vast majority supported the regulation as worded or asked for stronger wording.
- A large number of submitters requested that tethering be prohibited outright, followed by the request that companion animals should be required.
- A number of submitters also requested that shelter be specified further, and that it was important to differentiate between constantly tethered animals and animals tethered for a short amount of time.
- A small number of submitters called for a higher infringement fee.

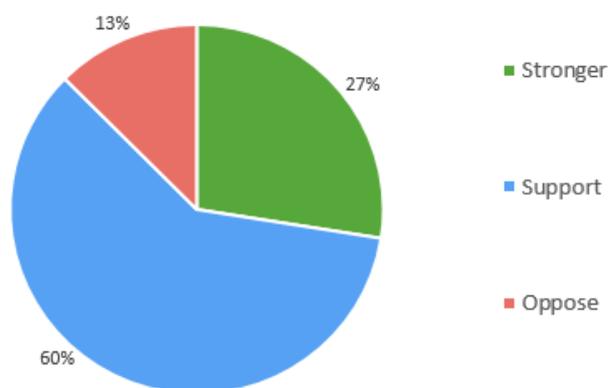


17. Layer Hens – opportunity to express normal behaviours in housing systems (40 submissions)

Proposal:

1. Hens must have the opportunity to express a range of normal behaviours. These include, but are not limited to nesting, perching, scratching, ground pecking, and dustbathing.
2. Any cage installed prior to 31 December 1999 must be replaced with a housing system that meets the requirements specified in (a) by 31 December 2018.
3. Any cage installed prior to 31 December 2001 must be replaced with a housing system that meets the requirements specified in (a) by 31 December 2020.
4. All cages must be replaced with a housing system that meets the requirements specified in (a) by 31 December 2022.
5. Any housing system installed from 7 December 2012 must meet the requirements specified in (a).

- The vast majority supported the regulation as worded or asked for stronger wording.
- Submissions asking for stronger wording requested a prohibition of colony cages and a review of factory farming practice. Many of these submissions related generally to the expression of behaviours in hens in cages, but did not comment on the regulation specifically.
- A number of submitters requested the wording of the regulation be clarified, including further defining what constitutes normal behaviours.
- A number of submitters were concerned that the current state would be difficult to enforce.
- There were 715 submissions that did not directly comment on the proposal, but asked for cages for chickens, or all regulations relating to factory farming to be removed.

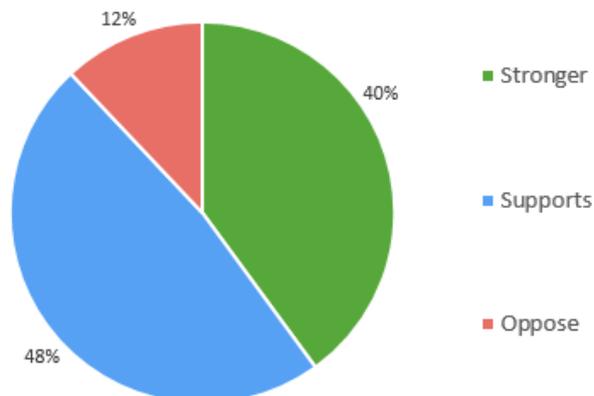


18. Layer hens – stocking densities (50 submissions)

Proposal:

- (a) Stocking densities or space per pullet (7–18 weeks of age):
 - (i) Must be a minimum of 370 cm² per pullet for those reared in cages or colony cages.
 - (ii) Must not exceed 14 pullets per m² for those reared in barns.
- (b) Stocking densities or space per layer hen (19 weeks of age or older):
 - Cages (iii) Must be a minimum of 550 cm² per hen for all cages from 1 January 2014.
 - Colony cages (i) Must be a minimum of 750 cm² per hen or 13 hens per m².
 - Barns (i) Must not exceed 7 hens per m² for barns with no access to an outdoor ranging area.
 - (ii) Must not exceed 9 hens per m² for within barns with access to an outdoor ranging area.
- (c) Stocking of the outdoor ranging area must not exceed 2,500 hens per hectare.

- The majority supported the regulation as worded or asked for stronger wording.
- Submissions asking for stronger wording requested the density space be increased, for example 13 hens per m² was too much for colony cages.
- Another stronger position requested that the associated penalty be a regulatory offence to offer adequate deterrence.
- A number of submitters commented that across all systems that stocking density requirements were too high.
- There were 692 submissions received that did not directly comment on the proposal, but either called for factory farming to be reviewed, or called for cages for hens to be banned.



19. Layer hens – housing and equipment design (47 submissions)

Proposal:

Housing and equipment design – lift the minimum standards below into regulation

Layer hens code of welfare

Minimum Standard 4

(i) The following specific design requirements apply, according to the housing system:

Cages:

- (i) Multi-deck cages must be arranged so that the layer hens in the lower tiers are protected from excreta from above.
- (ii) Manure must be removed from under a cage before it accumulates sufficiently to touch the cage floor.
- (iii) All cages for layer hens must have:
 - A floor slope not exceeding 8 degrees which supports the forward facing claws.
 - A cage height of at least 40cm over 65% of the cage floor area and not less than 35cm at any point.
 - Access for each layer hen to at least two drinking points.
 - Suitable claw shortening devices fitted, if any modifications are made to the cages.

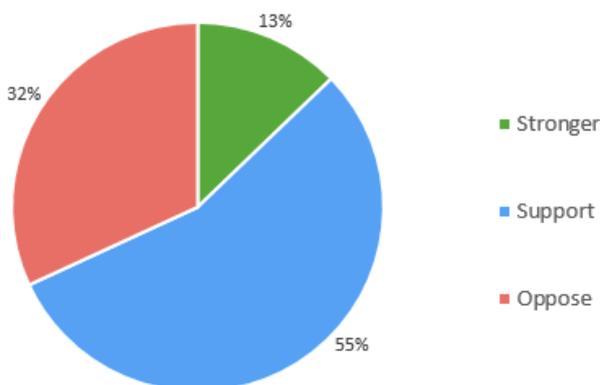
Colony Cages:

- (i) A secluded nest area must be provided and the floor of the nest area must be covered with a suitable substrate that prevents direct contact of hens with the wire mesh floor.
- (ii) Floor slope must not exceed 8 degrees which supports the forward facing claws.
- (iii) A colony cage height must be at least 45 cm other than in the nest area.
- (iv) Perches must be provided and designed to allow the hen to grip without risk of trapping its claws and must provide at least 15cm of space per hen to allow all birds to perch at the same time.
- (v) A scratching area must be provided.
- (vi) Suitable claw shortening devices must be fitted.

Barns:

- (i) Secluded nest areas must be provided and must be of adequate size and number to meet the laying needs of all hens, and ensure hens can lay without undue competition.
- (ii) The floor of the nest area must be covered with a suitable substrate that prevents direct contact of hens with a wire mesh floor.
- (iii) Perching areas must be provided and designed to allow the hen to grip without risk of trapping its claws and must allow all birds to perch at the same time.
- (iv) Perches must be placed to prevent the fouling of hens or their food on lower levels and of a height that allows hens to use them easily and without risk of injury.
- (v) Any slatted, wire or perforated floors must be constructed to support the forward facing claws.
- (vi) In multi-tier systems the distance between the levels must be at least 45cm and the levels must be arranged so that the layer hens in the lower tiers are protected from excreta from above.
- (vii) All hens must have access to good quality friable litter at all times to allow them to scratch and forage.
- (viii) If openings to the outdoor area or winter garden are provided, they must be at least 35cm high and 40cm wide, and evenly distributed along the building, to allow hens free access without risk of smothering or injury.
- (ix) If openings to the outdoor area or winter garden are provided, they must be designed to minimise the adverse effects of the weather on the hens and on the quality of the litter

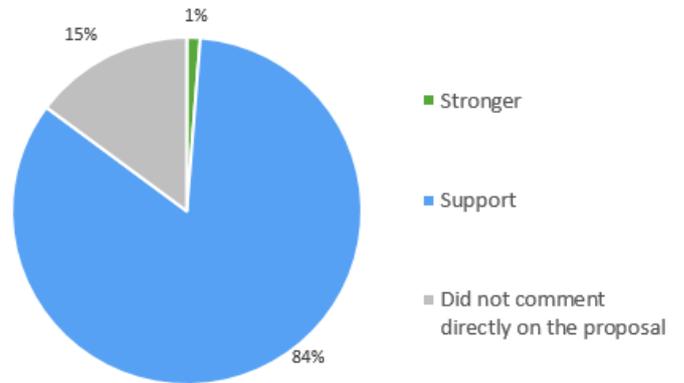
- The majority supported the regulation as worded or asked for stronger wording.
- Submissions asking for stronger wording requested that subjective wording be removed from the regulation and specific wording be added to concepts such as adequate and suitable to better define and make standards more easily enforceable.
- A number of submitters requested that litter requirements be removed or that the wording requiring litter at all time be replaced with the requirement to provide litter during daylight hours.
- There were 707 submissions that did not directly comment on the proposal, but asked for cages for chickens, or all regulations relating to factory farming to be removed.



20. Layer hens – prohibit induced moulting of layer hens (81 submissions)

Proposal: Prohibit induced moulting of layer hens

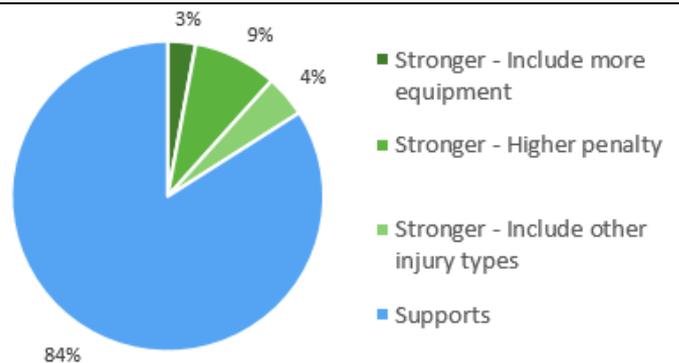
- The majority supported the regulation as worded.
- Submitters who supported the regulation thought it was sufficiently clear and precise to be enforced and that the penalty was appropriate.
- A small number of submissions were recorded as 'DNC' where the submitter supported the regulation in one submission but in another requested the removal of the regulations regarding factory farmed animals.



21. Llama and alpaca – Injuries from equipment such as halters, head ropes, and packs (69 submissions)

Proposal: The use of halters, head ropes, packs and other equipment on llama and alpaca must not cause cuts, abrasions, or swelling.

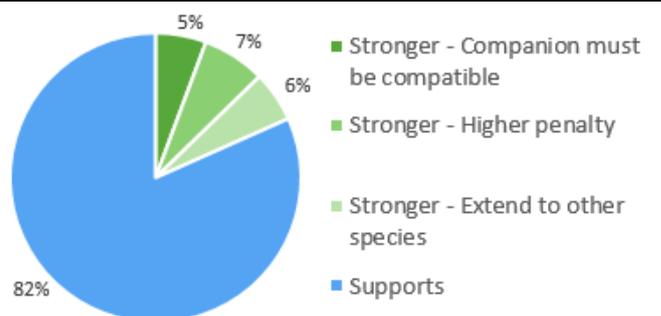
- The vast majority supported this regulation as worded.
- A number of submitters supported a higher infringement fine.
- Submissions asking for stronger wording also requested that cuts and abrasions be broadened to include hair loss which can be significantly painful to an animal.
- There was suggestion that the definition of equipment be expanded to include harnesses as well.



22. Llama and alpaca – Companion animals (71 submissions)

Proposal: Camelids must be provided with a companion animal such as another camelid, sheep, or goat.

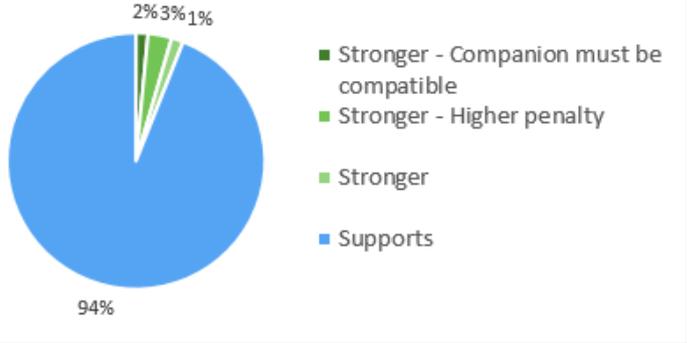
- The majority supported the regulation as worded or asked for stronger wording.
- A common stronger position requested that the companion animal must be compatible with the camelid.
- Submissions asking for weaker wording requested an allowance for animals to be able to be kept in isolation if they are sick or infectious.



23. Llama and alpaca – Offspring (Cria) camelid companions (67 submissions)

Proposal: Prohibit raising Cria without the company of other camelids.

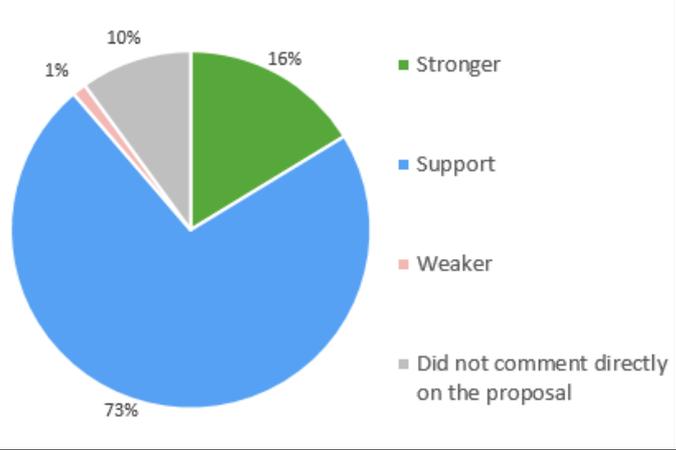
- The vast majority supported the regulation as worded.
- In particular it was emphasised that the companion animal must be another camelid or compatible animal.
- One submitter requested that this be required for Cria until the age of 18/24 months.
- A small number of submitters called for a higher infringement fine.



24. Pigs – Dry sleeping area (80 submissions)

Pigs must have access to a dry sleeping area

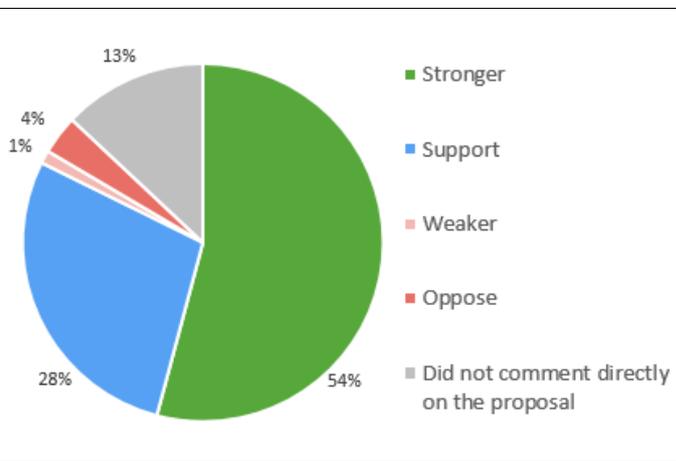
- No submissions opposed regulation in this area.
- The majority supported the regulation as worded or asked for stronger wording.
- Submissions asking for stronger worded related to extending the scope of the regulation to include concepts such as draft free, adequate ventilation and sanitation.



25. Pigs - Lying space for grower pigs (85 submissions)

Proposal: 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 = 0.03 x liveweight^{0.67} (kg)

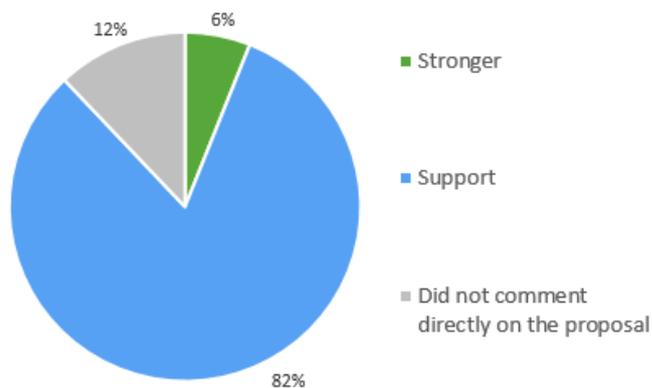
- The majority supported the regulation as worded or asked for stronger wording.
- Stronger positions requested referring to *area* or *space allowance* in the regulation wording rather than 'lying space'.
- Submitters also noted a required correction in the calculation of the live weight formula as printed in the consultation document.
- Three submitters opposed the regulation on the basis that pigs should not be housed inside.



26. Pigs – Dry sow stalls (83 submissions)

Proposal: Dry sow stalls must not be used.

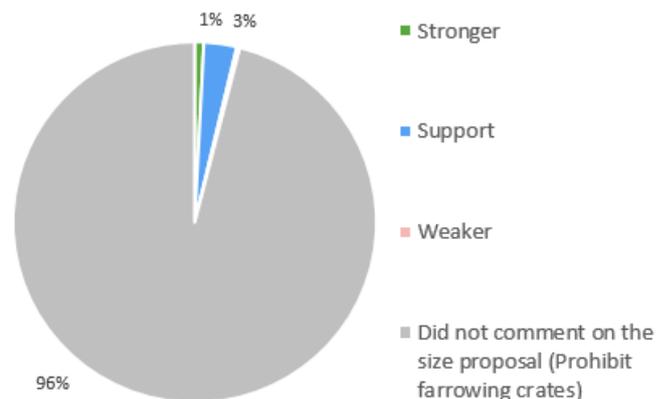
- The majority supported the regulation as worded.
- Stronger positions requested that the wording be better defined to strengthen enforceability, and/or for the regulation to be placed into the main Act as an offence.
- A small number of submissions were recorded as 'DNC' where the submitter supported the regulation in one submission but in another requested the removal of the regulations regarding factory farmed animals.



27. Pigs – Size of farrowing crates (751 submissions)

Proposal: Prohibit keeping a sow in a farrowing crate where the sow cannot avoid touching the top of the crate, or touching both sides of the crate simultaneously, or touching the front and the back of the crate simultaneously.

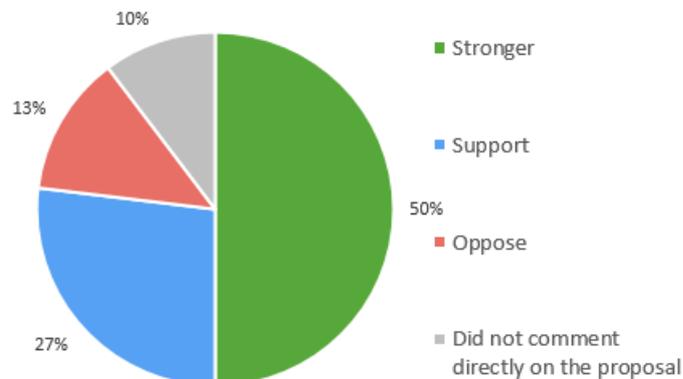
- The majority did not comment on the regulation itself, but sought an outright prohibition on the use of farrowing crates.
- Submitters who commented on the regulation specifically, either supported it as worded or requested the wording of the current minimum standard to be used instead.
- A general theme in the submissions was a support for the regulation to be a regulatory offence.



28. Pigs - Provision of nesting material (78 submissions)

Proposal: Sows, in any farrowing system constructed after 3 December 2010, must be provided with material that can be manipulated until farrowing.

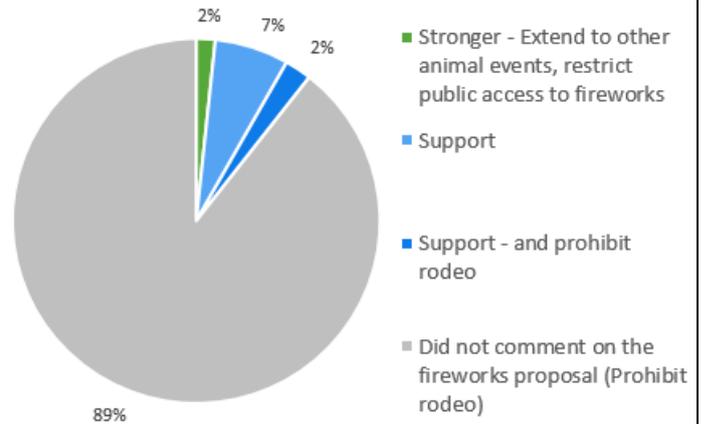
- The majority supported the regulation as worded or asked for stronger wording.
- Stronger positions requested that the regulation be extended to all pigs, and that space for the sow be increased in farrowing situations.
- A number of submitters requested that the definition of manipulable material be better defined.
- Submitters opposed to the regulation requested that it not proceed until evidence is produced that manipulable material can be provided in current commercial farrowing systems in a way that improves sow welfare but does not compromise other welfare elements of effluent systems.



29. Rodeos – fireworks (720 submissions)

Proposal: Fireworks, pyrotechnics, and gas fired explosions of any type must not be used at rodeos.

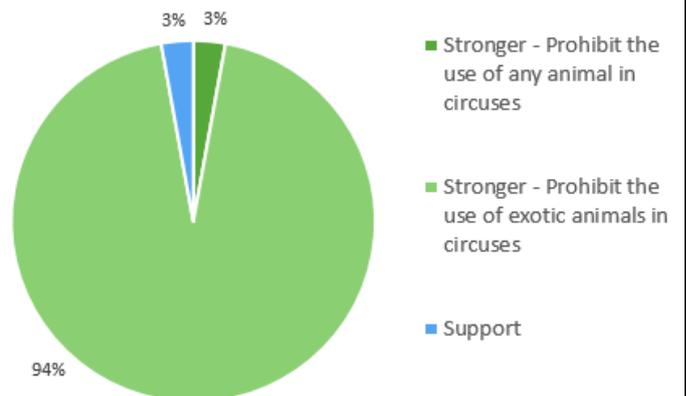
- The majority did not comment on the use of fireworks at rodeos but asked for rodeo to be prohibited.
- Of those that did comment the majority supported the regulation as worded or asked for stronger wording.
- The most common stronger positions requested the regulation be extended to all animal entertainment events and/or tighter restrictions on public use of fireworks, more regulation of rodeo events, or higher penalties for use of fireworks.



30. Circuses – exotic animals (705 submissions)

Proposal: Place restrictions on the use of exotic animals in circuses to adequately provide for their physical, health, and behavioural needs.

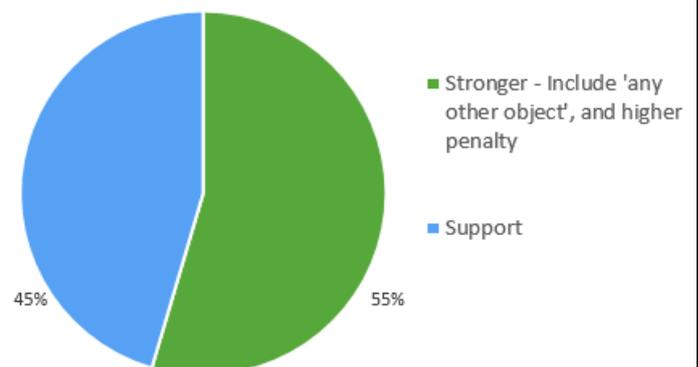
- The vast majority asked for stronger wording, requesting a direct prohibition on the use of exotic animals in circuses.
- A smaller number of submitters proposed prohibiting the use of all animals in circuses.
- Most submitters were silent on the use of non-exotic animals but some suggested the use of domestic animals in circuses could continue if well managed.



31. Milk stimulation (77 submissions)

Proposal: Prohibit stimulating milk let-down by inserting water or air into a cow's vagina.

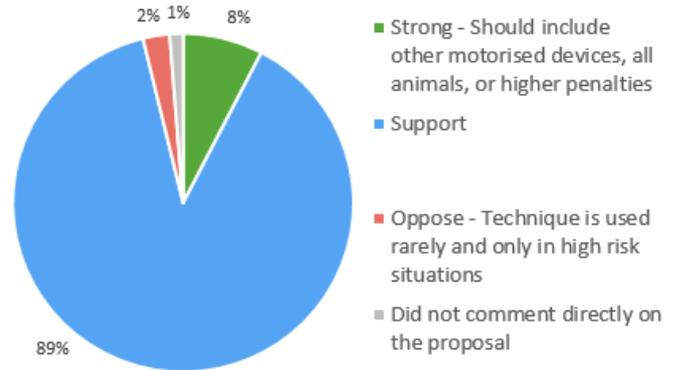
- No submissions opposed regulation in this area.
- The most common stronger position requested including 'any other object' and/or hands.
- A smaller number felt a stronger penalty should apply.



32. Cattle and sheep – vehicular traction in calving and lambing (79 submissions)

Proposal: Prohibit using a moving vehicle to provide traction in calving or lambing.

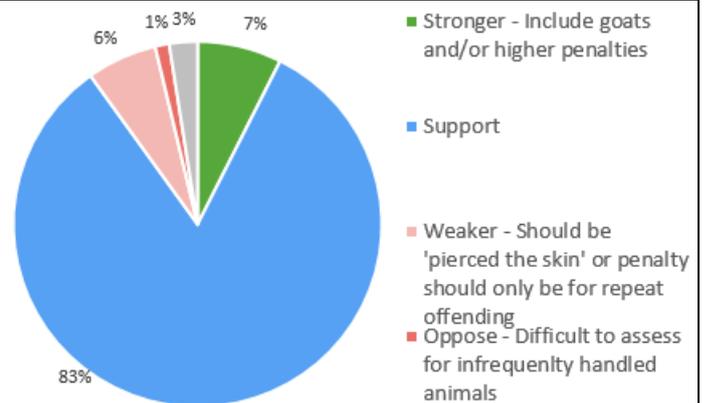
- The vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested a higher penalty. Other positions also asked for other motorised devices and for all animals to be included.
- Opposition to the regulation stated that the technique is rarely used, but sometimes necessary in an emergency and should not be regulated.



33. Cattle and sheep with ingrown horns (81 submissions)

Proposal: Failure to treat an ingrown horn that is touching skin or eye.

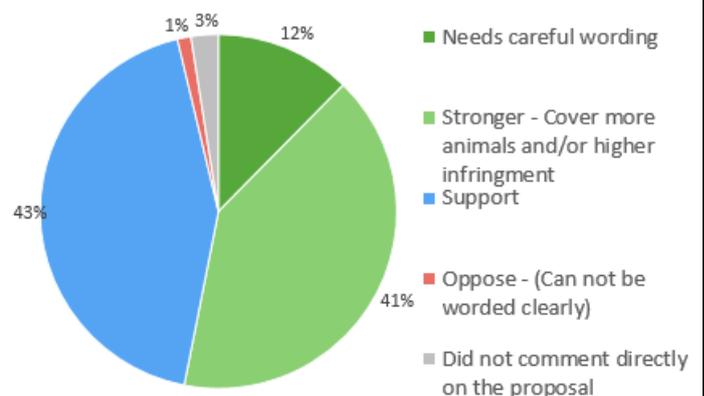
- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested goats be included and/or a higher penalty.
- Submissions asking for weaker wording either requested the offence be for failure to treat an ingrown horn 'piercing the skin' instead of 'touching' or for penalties only to apply to repeat offenders.
- Submitters opposed to the regulation noted the difficulties that arise when animals are mustered only once or twice a year and the treatment difficulties if the rules around dehorning are made more restrictive.



34. Stock transport – Cuts and abrasions (81 submissions)

Proposal: Transport of cattle, deer, sheep, goats, and pigs must not result in cuts or abrasions.

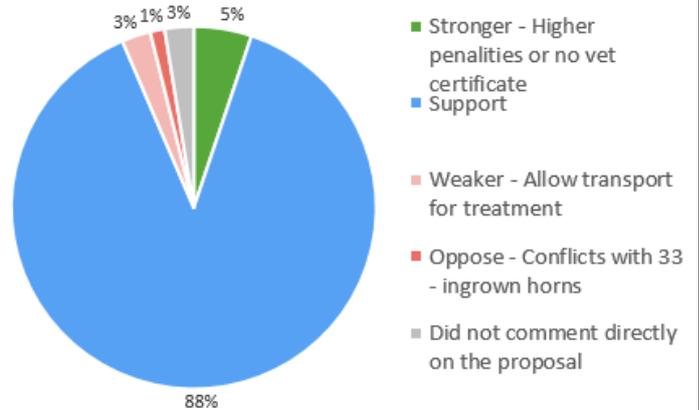
- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested all animals be covered and a higher penalty of \$500 or more.
- A number of submitters considered that the offence needed careful wording to avoid capturing minor scrapes and/or to ensure prosecutions can be taken for severe injuries. Most were supportive but some opposed regulation as they could not see how it could be worded clearly enough to be suitable for regulation.



35. Stock transport – Animals with ingrown horns (78 submissions)

Proposal: An animal with an ingrown horn that is touching skin or eye must not be transported, except when certified fit for transport by a veterinarian.

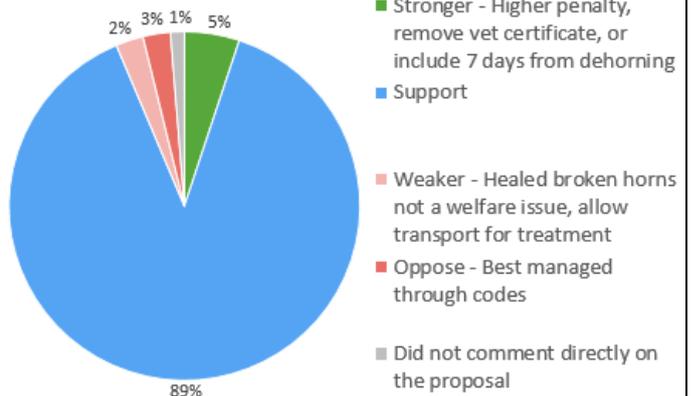
- The majority supported the regulation as worded.
- The most common stronger position requested a higher penalty and/or no allowance for veterinarians to certify animals fit for transport.
- The most common weaker position requested that the transport of animals for treatment be allowed without a veterinary certificate.
- A number of submitters commented on the interaction of this regulation with 33. *Failure to treat an ingrown horn.*



36. Stock transport – Animals with bleeding horns or antlers (79 submissions)

Proposal: An animal with a bleeding or broken horn or antler must not be transported, except when certified fit for transport by a veterinarian.

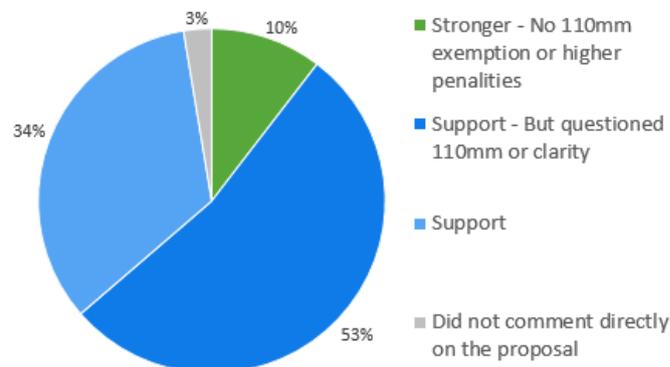
- The majority supported the regulation as worded.
- The most common stronger position requested a higher penalty and/or no allowance for veterinarians to certify animals fit for transport and/or including not transporting animals until a week after dehorning.
- The most common weaker position noted that broken but healed horns should not be captured and/or requested that that transport of animals for treatment be allowed without a veterinary certificate.
- Submitters opposed to the regulation thought this issue is best left in code of welfare.



37. Stock transport – Animals with long horns or antlers (77 submissions)

Proposal: Transport of animals with long horns or antlers greater than 110mm must not cause injury to themselves or other animals.

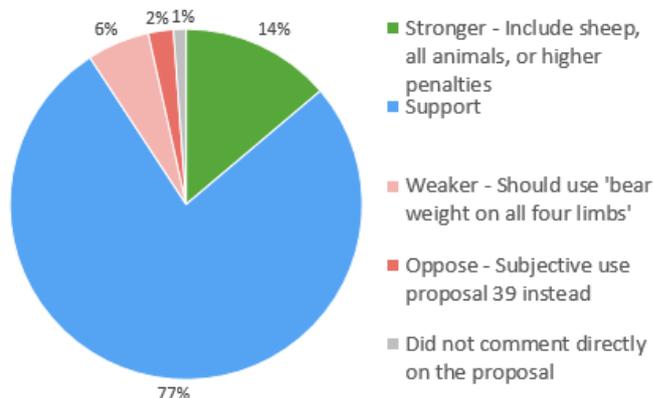
- The majority supported the regulation. However, most also questioned the basis for the 110 millimetres, how it was arrived at, whether it applied to horns or just antlers, how it should be measured, and whether it was necessary.
- The most common stronger position requested no 110mm allowance and just to focus on outcomes – no injuries to or from horns/antlers. A number of submitters also asked for higher penalties and that deer in velvet antler not be transported.
- No submitters directly opposed the regulation though a number noted it lacked clarity and could be misinterpreted.



38. Stock transport – Lamé cattle, deer, pigs, and goats (87 submissions)

Proposal: A cattle beast, deer, pig, or goat that has a lameness score of two must not be transported, except when certified fit for transport by a veterinarian. A cattle beast, deer, pig, or goat that has a lameness score of three must not be transported.

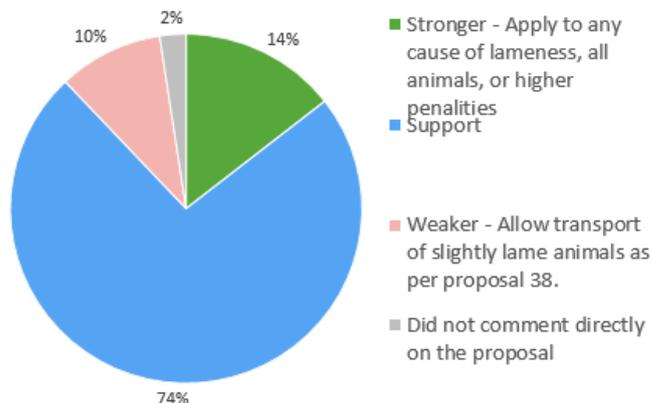
- The majority supported the intent of the regulation but there was plenty of discussion about the interaction with regulation 39, how to clearly define lameness, and which animals should be covered.
- The most common stronger position requested the inclusion of sheep, all animals or higher penalties. Other stronger positions included not allowing veterinarians to certify animals fit for transport or requiring veterinarians to certify every lame animal prior to transport.
- Submissions asking for weaker wording included allowing transport for treatment, only prohibiting lameness score 3, excluding goats, and using 'bear weight on all four limbs' instead.
- Submitters opposed to the regulation thought the lameness scale too subjective and regulation 39 should be used instead.



39. Stock transport – Animals that cannot bear weight evenly due to injury (83 submissions)

Proposal: A cattle beast, sheep, deer, pig, or goat that has suffered a physical injury or defect that means it cannot bear weight evenly on all four legs should not be transported, except when certified fit for transport by a veterinarian.

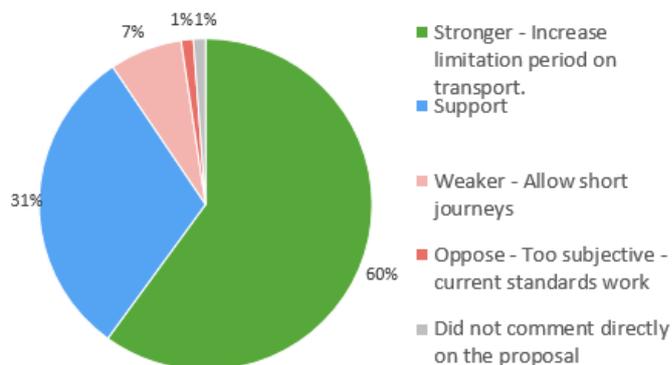
- No submissions opposed regulation in this area, but some had concerns about clarity and practicality.
- The majority supported the intent of the regulation but there was plenty of discussion about the interaction with regulation 38 and how best to define lameness.
- The most common stronger position requested the inclusion of all causes of lameness, all animals, or higher penalties. Other stronger positions included prohibiting transport or requiring veterinarians to certify every lame animal prior to transport.
- Submissions asking for weaker wording requested the wording 'able to bear weight on all four limbs' which allows for transport of minor lameness and animals with healed injuries. Transport for treatment also mentioned.



40. Stock transport – Pregnant animals (85 submissions)

Proposal: Prohibit transporting a cattle beast, sheep, deer, pig, or goat that is likely to give birth during transport, or within 24 hours of arrival at a commercial slaughter premises, except when certified fit for transport by a veterinarian.

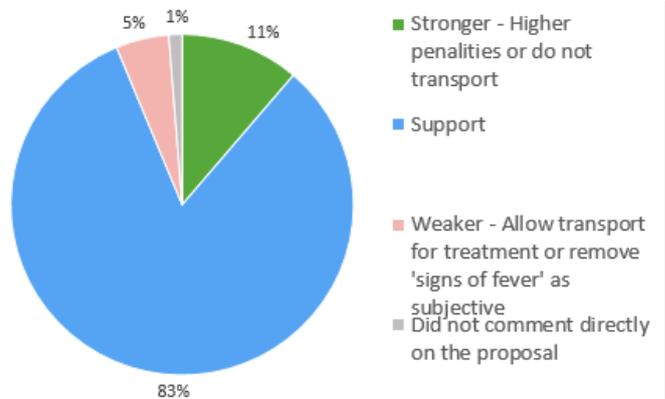
- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested a longer time period when the offence would apply (48hrs) or pregnant animals could not be transported (last week, 10%, 20%, or last 3rd of gestation). Other positions included higher penalties, or also covering birth within 24 hours of arrival at saleyards or on farm.
- Submissions asking for weaker wording requested exceptions for pre-mature births, for short journeys such as from the run-off block back to the home farm where animal can give birth in better facilities, or for unrecorded (i.e. unintended) pregnancies particularly in hoggets and deer.
- Opposed submitters had concerns that the regulation would be too subjective, or that some instances such as premature births are difficult to assess and beyond the farmers control.



41. Stock transport – Animals with injured or diseased udders (80 submissions)

Proposal: 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 or discharging, or necrotic must not be transported, except when certified fit for transport by a veterinarian.

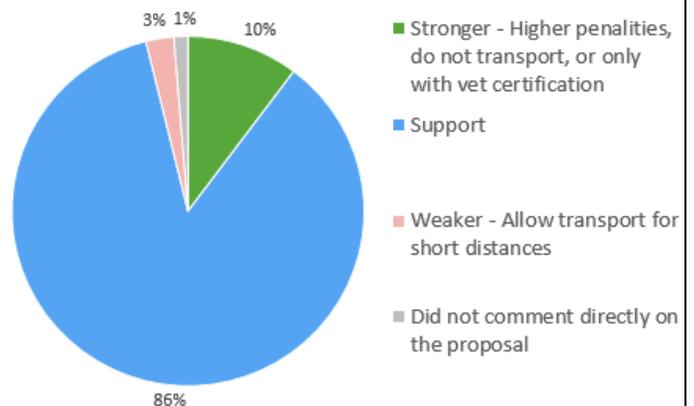
- The vast majority supported the regulation as worded or asked for stronger wording.
- Stronger positions requested not allowing transport of such animals at all and higher penalties.
- Submissions asking for weaker wording suggested removing 'signs of fever' as subjective, noted the difficulty of identifying udder issues in mobs of sheep, or suggested that transport to the works was the most practical end for an animal in this condition.



42. Stock transport – Cattle or sheep with cancer eye (78 submissions)

Proposal: 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, except when certified fit for transport by a veterinarian.

- The vast majority supported the regulation as worded or asked for stronger wording.
- Stronger positions requested not allowing transport of such animals at all, or requiring a veterinary certificate for any cancer eye, and/or higher penalties. Also noted that the 2cm cut-off relates to cattle and a smaller cut-off is probably more appropriate for sheep.
- Submitters asking for weaker wording requested the ability to transport short distances for treatment and also raised concerns about practicality of veterinary certification when animals are mustered for transport once or twice per year to be brought back to the home farm.

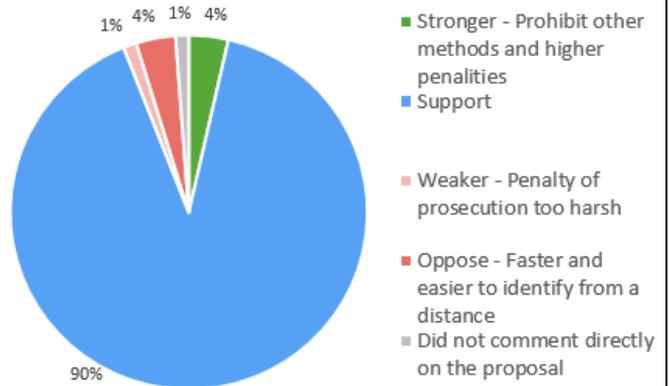


Surgical and Painful Procedure Regulatory Proposals

51. All animals - Hot branding (84 submissions)

Proposal: Prohibit hot branding.

- The majority supported the regulation as worded.
- Stronger positions requested other methods of marking (e.g. piercing and tattooing) be prohibited or asked for higher penalties.
- A submitter noted that prosecution seemed harsh given hot branding is currently a permitted activity.
- A number of submitters opposed the prohibition on the grounds that hot branding is faster and easier on the animals as well as making identification easier form a distance.



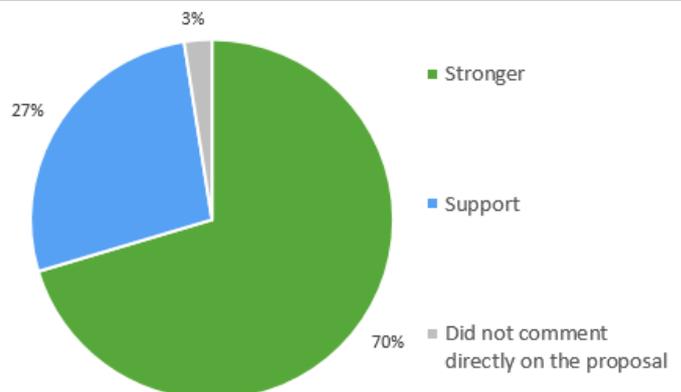
52. All animals - Embryo collection via exteriorised uterus (surgical embryo transfer) (81 submissions)

Proposal: May be performed by any person.

Pain relief must be used at the time of the procedure

This is a technique used to assist breeding where the uterus is pulled out through an incision in the side of an animal so that the embryo can be washed and collected

- No submissions opposed regulation in this area.
- A number of submitters noted that the procedure is widespread in NZ and used commonly in sheep, goat and cattle. Submitters also noted that the procedure differs between species and that a consistent approach needs to be taken.
- Most industry and advocacy organisations supported the regulation, with some asking for stronger wording relating to more requirements being put in place around who could undertake the procedure.
- A common stronger position requested that the procedure be prohibited or veterinarian only.

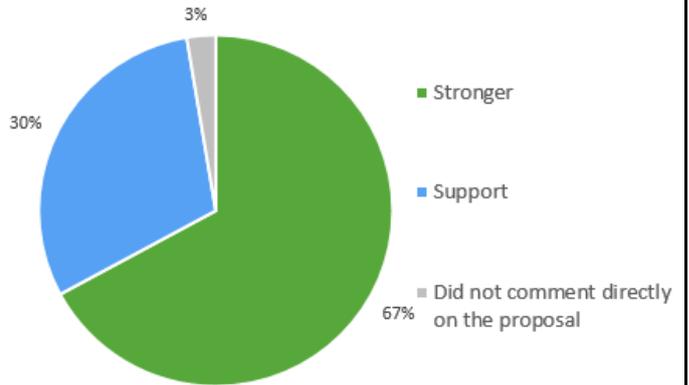


53. All animals - Laparoscopic artificial insemination (76 submissions)

Proposal: May be performed by any person.
Pain relief must be used at the time of the procedure

This is a technique used to assist breeding where semen is directly deposited into each of the uterine horns

- Industry organisations representing the dairy, beef and sheep sectors and advocacy groups differed on their support for this regulation.
- Most industry and advocacy organisations supported the regulation, with some asking for stronger wording relating to more requirements being put in place around who could undertake the procedure.
- A common stronger position requested that the procedure be prohibited or veterinarian only.

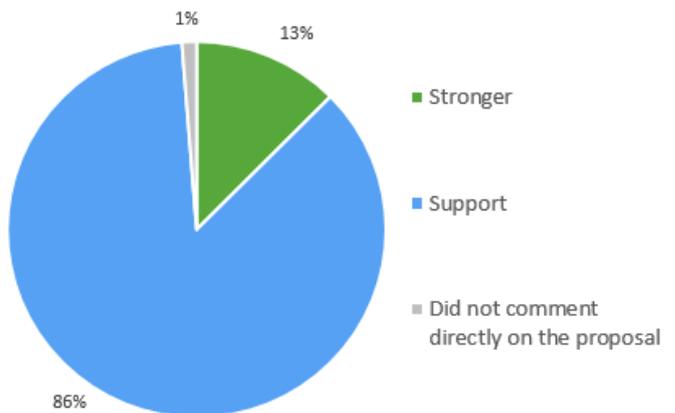


54. All animals – Liver biopsy (80 submissions)

Proposal: Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian
Pain relief must be used at the time of the procedure

This is a surgical procedure where a needle is inserted into the body of an animal to take a sample directly from the liver for nutritional or health assessments

- The majority supported the regulation as worded.
- Stronger positions requested use of long lasting pain relief, and limiting the procedure to situations that are in the best interests of the animal or where no alternative exists.
- One submitter from an industry organisation did not foresee any impact of the proposed regulation.

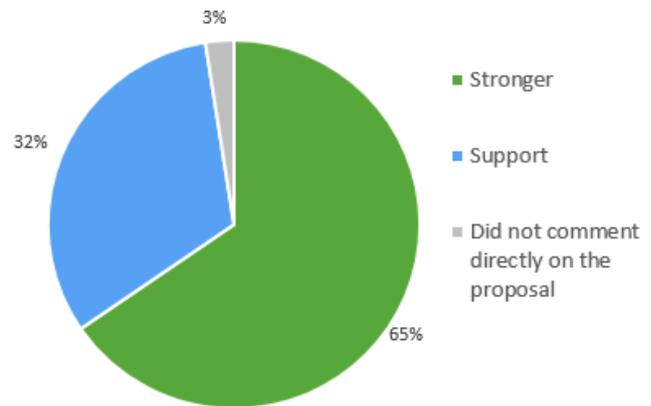


55. All animals – Dental work (81 submissions)

Proposal: Any power tool used on an animal for dental work must be designed for the purpose of dentistry.

Power tools are used in some dentistry procedures, for example, grinding float teeth

- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested a stronger penalty for offenders.
- Other stronger positions requested widening of the scope of the regulation and clarifying who can undertake a wider range of dental procedures, particularly if they are likely to fall within the definition of a significant surgical procedure.
- This was followed by requests for the procedure to be performed by a veterinarian only, or requiring operators to be suitably accredited or trained, requiring pain relief at the time of procedure, or requiring the procedure only be performed in the best interests of the animal.
- A number of submitters were concerned about the wording of the regulation as it may exclude some highly qualified equine veterinarians who effectively use non water cooled power tools, and power tools / power packs are not necessarily exclusively used for dentistry work



56. Cats – Declawing (85 submissions)

Proposal: Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian.

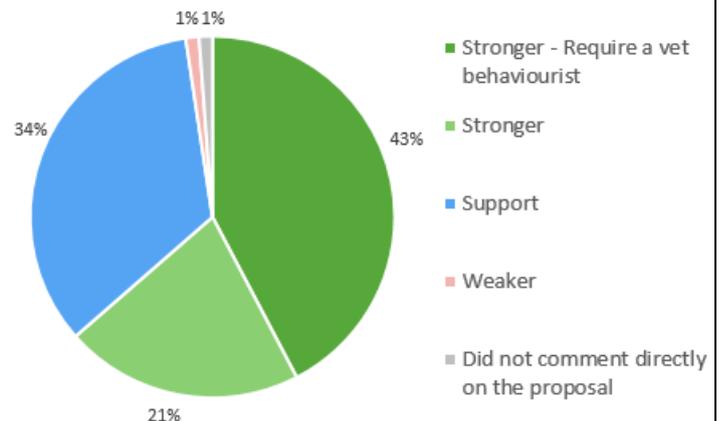
Must only be performed in the best interests of the animal.

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

For the purposes of this regulatory proposal it is proposed that the term 'best interests of the animal' will mean that this procedure should only be contemplated after other suitable means of treating inappropriate behaviour have been attempted and have failed and euthanasia is the only alternative.

Restricting a procedure to 'in the best interest of the animals' does not preclude a veterinarian from undertaking the procedure for therapeutic reasons as a result of disease or injury.

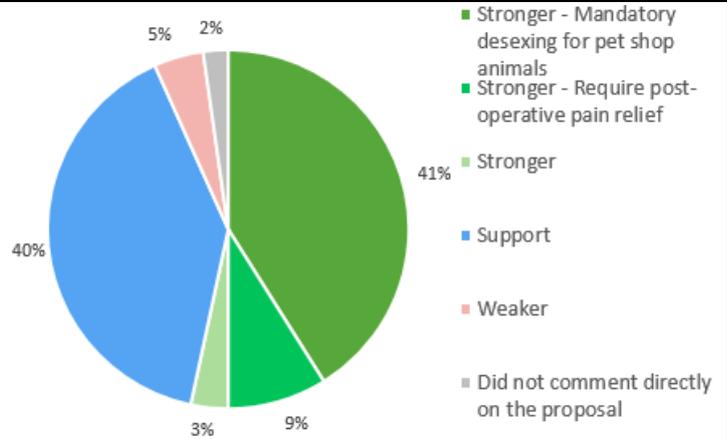
- The vast majority supported this regulation.
- The most common stronger position requested a compulsory consultation with a veterinary behaviourist before the procedure is performed.
- This was followed by outright prohibition (some allowed an exception for therapeutic reasons), as the procedure can be painful and lead to further health and behavioural issues.
- Submitters opposed to the regulation thought that it was unfounded, and that declawing a cat would be better for its welfare than having it put down.
- A number of submitters were concerned that 'best interests' would be loosely interpreted and so an easier test to overcome than intended.



57. Companion animals – Desexing (including stray/feral cats, dogs, and other species) (90 submissions)

Proposal: Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian. Pain relief must be used at the time of the procedure.

- The vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested the regulation require desexing to be mandatory at the point of sale from pet shops.
- A number of advocacy and veterinary organisations requested post-operative pain relief to be required as well.
- A number of submitters thought that properly trained and qualified veterinarian nurses should be allowed to perform the procedure, especially as it would save animal shelters money.
- This was opposed by one industry organisation who did not support veterinarian nurses performing the procedure, even under the supervision of a veterinarian.

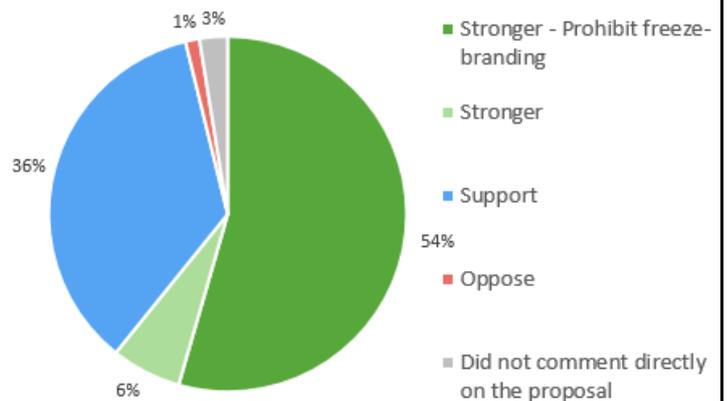


58. Dogs – Freeze branding (79 submissions)

Proposal: Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian. Pain relief must be used at the time of the procedure.

Freeze branding is a method of identification where a coolant is applied to the branding iron, rather than heat. This works at the site to destroy the pigment-producing hair cells, causing the hair to grow white where the brand has been applied.

- A vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested an outright prohibition as they considered that there were other less painful alternatives which still made a dog identifiable.
- A number of submitters including a veterinary organisation supported the regulations wording, as it can be useful in some circumstances (i.e. identifying dogs in hunting blocks or DOC land).
- The submitter opposed to the regulation supported the status quo, as they had anecdotal evidence that hunters who use dogs often use laypeople experienced in freeze branding, and they guessed veterinarians would not have often performed this procedure. Instead they suggested having a veterinarian present at the time the procedure is performed.



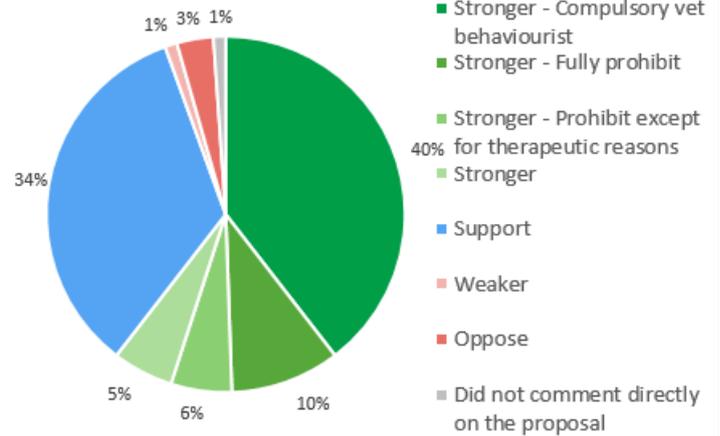
59. Dogs – Dog debarking (and devoicing of other species) (91 submissions)

Proposal: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. Must only be performed in the best interest of the animal. Pain relief must be used at the time of the procedure.

The purpose of debarking is to remove the sound made when a dog barks.

For the purposes of this regulatory proposal it is proposed that the term ‘best interests of the animal’ will mean that this procedure should only be contemplated after other suitable means of treating inappropriate barking have been attempted and have failed and euthanasia is the only alternative.

- A vast majority supported the regulation as worded or asked for stronger wording.
- Submitters who supported the regulation thought the procedure unnecessary because it removed a form of communication from the dog, and could lead to frustration which could lead to other unsatisfactory behaviours.
- The most common stronger position requested a compulsory consultation with a veterinary behaviourist before the procedure is performed.
- This was followed by a request for prohibition of the procedure. Of those, a number of submitters allowed an exception for therapeutic reasons such as injury or disease.
- Submitters opposed to the regulation thought that debarking was a much better alternative to a dog being euthanised because it barks.
- While this regulation applies to devoicing of other species as well, the submissions focusses on the debarking of dogs.

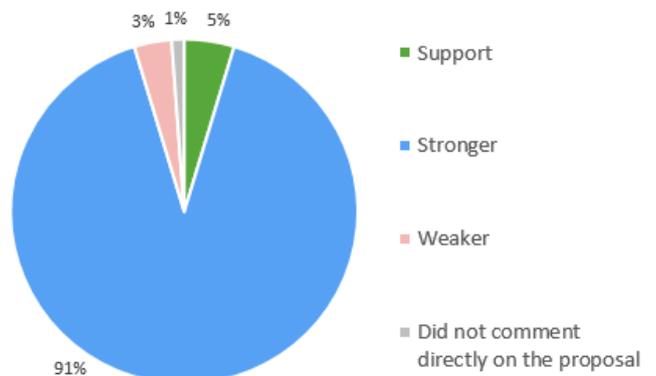


60. Dogs – Cropping the ears (86 submissions)

Proposal: Prohibit the cropping of a dogs ears

In relation to this proposal, cropping means performing, on the pinnae of the ears of the dog, a surgical procedure that is designed to make the ears of the dog stand upright.

- No submissions opposed regulation in this area.
- A vast majority supported the regulation as worded.
- A small number of submitters supported stronger penalties including a ban on owning animals in the future.
- Submissions asking for weaker wording requested that they be permitted to import a cropped dog from a ‘recognised’ country where cropping is allowed, should be allowed.



61. Dew claws (279 submissions)

Proposal:

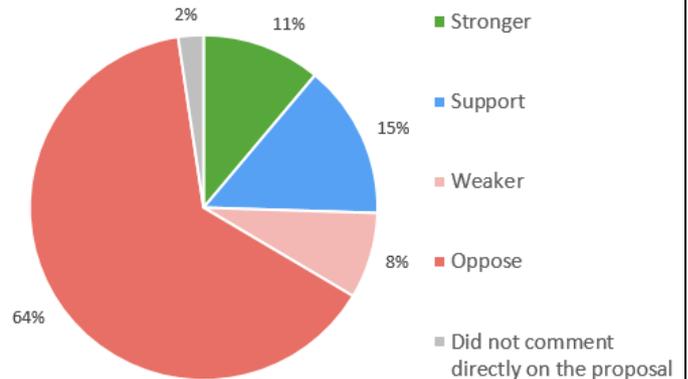
Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

Must be performed by a veterinary or a veterinary student under the direct supervision of a veterinarian;
Must only be performed for therapeutic reasons; and
Pain relief must be used at the time of the procedure.

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

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

- The majority opposed the regulation as worded as they believed removal of dew claws is in the best interest of dogs to prevent injury.
- Submitters opposed to the regulation claim working dogs are at higher risk of injury from having dew claws.
- An industry organisation suggested that non-veterinarians be trained under a best practice scheme.
- The most common stronger position requested that both front and hind limb claws be removed by a vet.



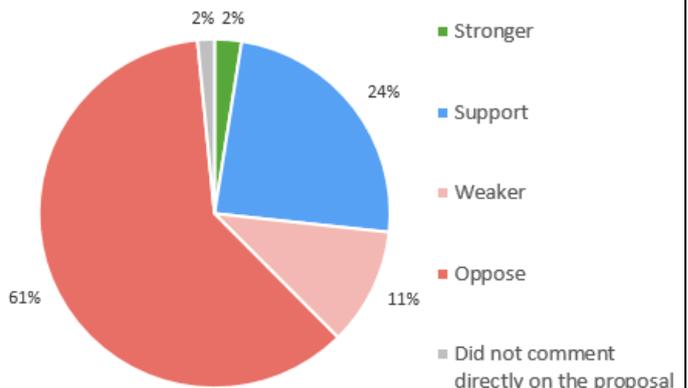
62. Dogs – tail docking (303 submissions)

Proposal: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

Must only be performed for therapeutic reasons.

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

- The majority opposed the regulation as worded.
- Submitters opposed to the regulation considered that:
 - Banding/docking is a preventative measure against risk of injury;
 - The procedure does not cause puppies under the age of 4 days old any pain or distress (or any level of pain is minimal).
 - The status quo should be retained under the Accredited Banding Scheme
- Submitters who supported the regulation generally do not agree with docking tails for aesthetic reasons, and believe that dogs' tails have a function in terms of balance and communication with other dogs and humans.



63. Cattle – Teats (78 submissions)

Proposal:

Supernumerary teat removal (up to 6 weeks of age)—when not performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian:

May be performed by any person.

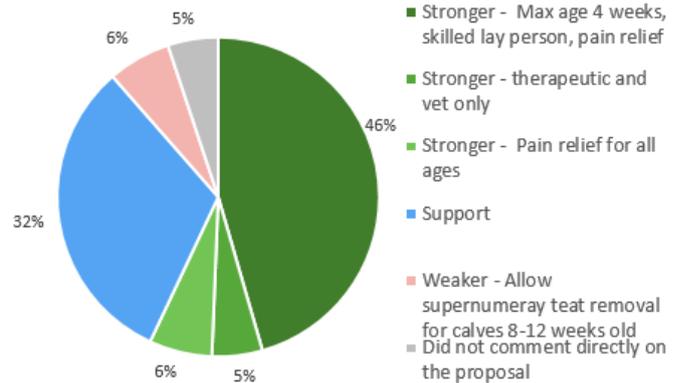
Must create a clear cut and not tear or crush the tissue. Clean scissors, free of visible contamination, must be used for the procedure.

Teat removal (of one of the main 4 teats) or supernumerary teat removal (over 6 weeks of age):

Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

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

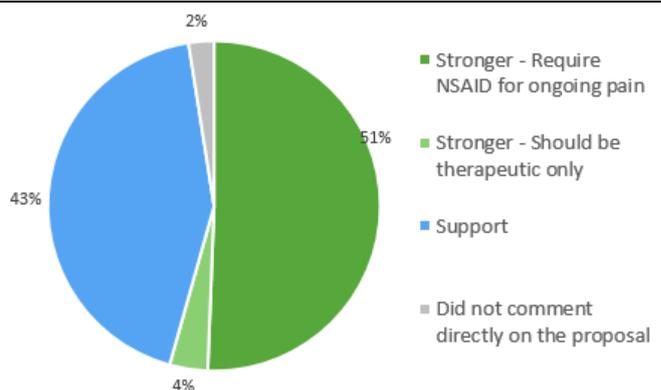
- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested the maximum age for supernumerary teat removal be reduced to 4 weeks, pain relief is used, and that a veterinarian sign off that a person is competent to perform the procedure.
- A number of submitters also asked that pain relief always be used or that teat only be removed for therapeutic reasons.
- The most common weaker position requested that supernumerary teats be allowed to be removed by a lay person up at the same time as disbudding to reduce calf handling. This was variably given as 8 to 12 weeks. Submitters suggested that supernumerary teats remain small in this period.



64. Cattle – claw removal (81 submissions)

Proposal: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. Pain relief must be used at the time of the procedure.

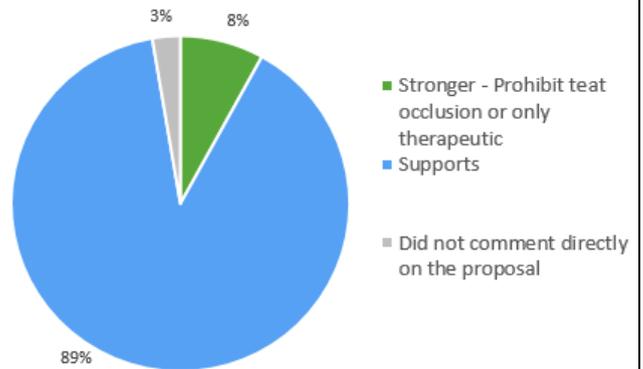
- The majority supported the regulation or asked for stronger wording.
- The most common stronger position requested that non-steroidal anti-inflammatory drugs (NSAID) be required for ongoing pain relief.
- A number of submitters also suggested that the procedure should only be performed for therapeutic reasons.



65. Cattle – teat occlusion (77 submissions)

Proposal: Teat occlusion is prohibited other than with a teat sealant registered under the Agricultural Compounds and Veterinary Medicines Act 1997.

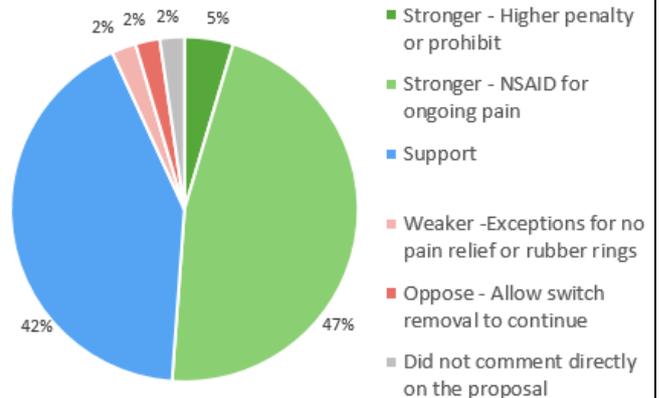
- No submissions opposed regulation in this area.
- A number of submitters requested that teat occlusion be entirely prohibited or only allowed for therapeutic reasons.



66. Cattle – Tail docking (88 submissions)

Proposal: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. May only be performed for therapeutic reasons. Pain relief must be used at the time of the procedure.

- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested that non-steroidal anti-inflammatory drugs (NSAIDs) be required for ongoing pain relief. Other stronger positions requested a higher penalty or tightening the meaning of 'therapeutic'.
- Submissions asking for weaker wording requested an exception to allow non-veterinarians to treat tail injuries with rubber rings or to allow the procedure to be performed with no pain relief under 4 days of age.
- Submitters opposed to the regulation want to allow switch removal to continue.



67. Cattle and sheep – castration and shortening of the scrotum (83 submissions)

Proposal:

Castration and shortening of the scrotum (under 6 months of age):

May be undertaken by any person.

Conventional rubber rings must only be used for this procedure.

Castration and shortening of the scrotum (over 6 months of age):

Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

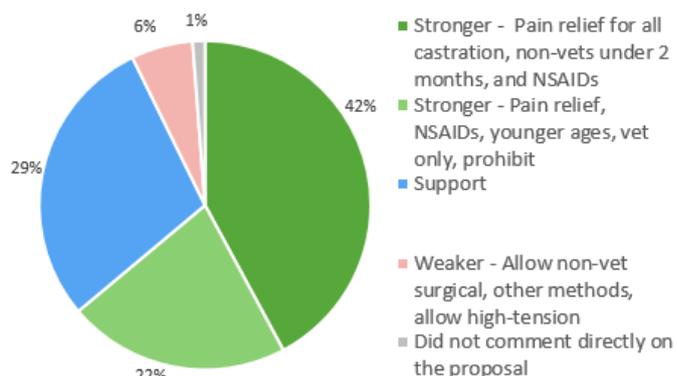
Pain relief must be used at the time of the procedure.

Surgical castration (at any age):

Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

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

- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested the pain relief for all castration including non-steroidal anti-inflammatory drugs (NSAIDs) for ongoing pain, and that non-veterinarians could only castrate animals using rubber rings under 2 months of age.
- Other stronger positions also advocated for differing pain relief and training requirements, age limits (6, 8, 12 weeks), method restrictions or prohibition.
- Submissions asking for weaker wording requested that non-veterinarians be allowed to surgically castrate, to ban high tension bands rather than prescribe rubber rings, to allow for other methods to be developed, or to allow the use of high tension bands with pain relief.
- A number of submitters were concerned about practicality if this high volume procedure became too restricted.



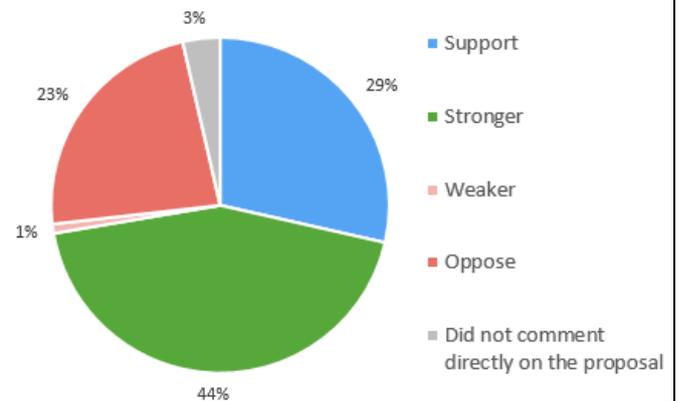
68. Cattle, sheep, & goats – Disbudding (112 submissions)

Proposal: May be performed by any person

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

(Disbudding is the destruction, by any method, of the free-floating immature horn tissue from which the horns of an animal subsequently develop.)

- The majority supported the regulation or asked for stronger wording.
- The most common stronger position requested that the procedure should be done by a vet, accredited or trained operator and not just 'anyone' as proposed. This was followed by mandatory post-operative pain relief.
- Some industry organisations supported the regulation but noted the need for a lead in time to upskill operators and ensure systems to allow non-veterinarians too effectively and efficiently access pain relief.
- A number of submitters opposed the regulation on the basis that some disbudding methods did not cause undue pain and therefore pain relief was unnecessary.
- Other submitters opposing the regulation, including other industry organisations, noted that pain relief may cause more problems, that there needs to be considerable upskilling before this regulation could be implemented, the need for better relationships between farmers and vets, and increased costs on the farmers.
- Submitters representing the veterinarian sector differed on whether this procedure, when performed on sheep and cattle, should be done by a veterinarian / veterinarian technician or whether it was appropriate to be done by a skilled non-veterinarian operators. They agreed that for goats this should be a veterinarian only procedure due to a goat's susceptibility to anaesthesia and sensitive skull.



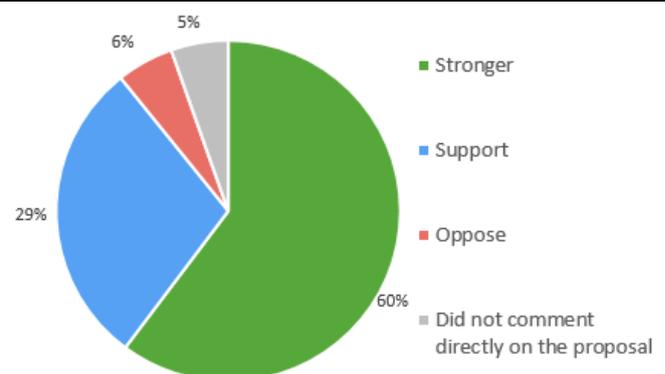
69. Cattle, sheep, & goats – Dehorning (93 submissions)

Proposal: May be performed by any person

Pain relief must be used at the time of the procedure

(Dehorning is the removal of the whole horns from an animal by amputation.)

- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested that the procedure should be done by a veterinarian only. This was followed by a request that the regulation specifically state that it must be undertaken by an accredited or trained operator and not just 'anyone' as proposed. There was also strong support for post-operative pain relief from these submitters.
- Submitters representing dairy industry organisations supported the regulation but noted the need for a lead in time.
- A number of submitters, including other industry organisations, opposed the regulation and noted that pain relief may cause more problems, that there needs to be considerable upskilling before this regulation could be implemented, the need for better relationships between farmers and vets, and increased costs on the farmers. They also considered that removing the tip of the horn (tipping) should be allowed at any age without pain relief.
- As with disbudding, it was proposed by a number of submitters that the procedure on goats should be veterinarian only due to a goat's susceptibility to anaesthesia and sensitive skull.
- A small number of submitters called for tipping to be included within the definition of a dehorning due to the potential for this procedure to cause pain.



70. Sheep – tail docking (86 submissions)

Proposal:

Tail docking (under 6 months of age):

May be performed by any person.

Must use hot iron or rubber rings only.

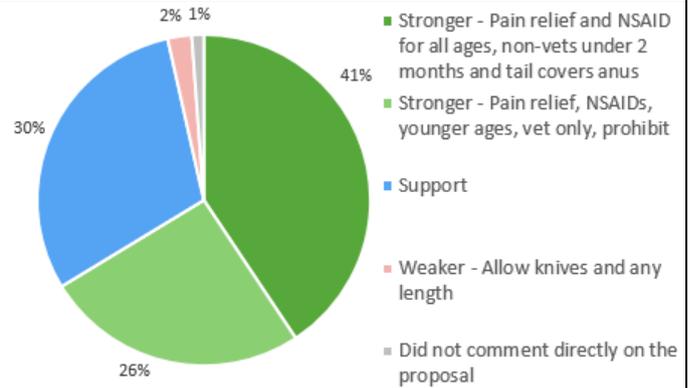
Tail must not be flush.

Tail docking (over 6 months of age):

Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

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

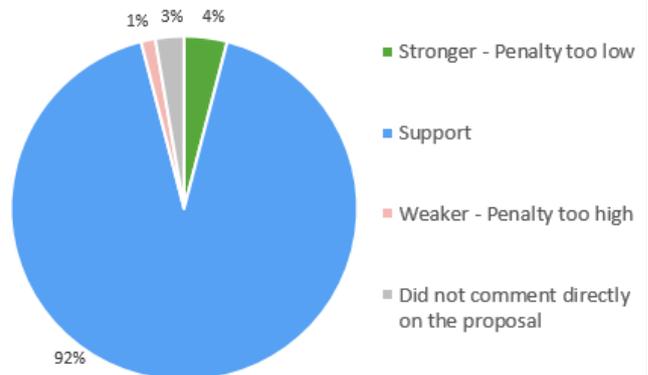
- The majority supported the regulation or stronger positions.
- The most common stronger position requested the pain relief for all ages including non-steroidal anti-inflammatory drugs (NSAIDs) for ongoing pain and that non-veterinarian can only tail dock under 2 months of age.
- Other stronger positions also advocated for differing pain relief and training requirements, age limits (6, 8, 12 weeks), method restrictions or prohibition.
- The weaker positions requested that non-veterinarians be allowed to surgically tail lambs and to allow any length including flush.



71. Sheep – Mulesing (75 submissions)

Proposal: Prohibit mulesing

- The vast majority supported the regulation as worded.
- A small number of submitters asking for stronger wording requested a higher penalty or tightening the prohibition to exclude 'therapeutic'.
- Some concern about the level of the penalty was expressed, particularly the inclusion of a criminal conviction.

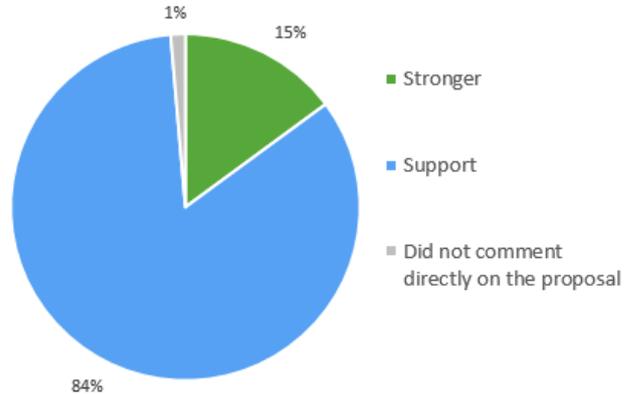


72. Deer – Develvetting (74 submissions)

Proposal: The person undertaking the procedure must be either:
 A veterinarian or veterinary student under direct veterinarian supervision; or
 Have veterinary approval.
 Pain relief must be used at the time of the procedure.

Veterinary approval must be in writing before the procedure occurs. 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.

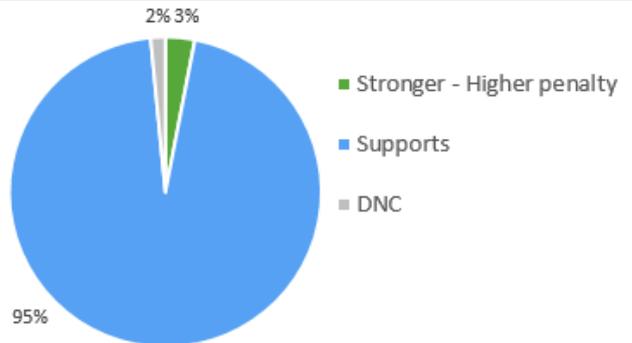
- The majority supported the regulation as worded.
- One industry organisation indicated that there needed to be a stronger emphasis on the expertise required to undertake the procedure. They also suggested changes to the definition of pain relief to reflect current practice within the deer industry.
- A number of submitters, including advocacy organisations, wanted the procedure prohibited.



73. Horses – Blistering, firing or nicking (66 submissions)

Proposal: Prohibit blistering, firing or nicking.

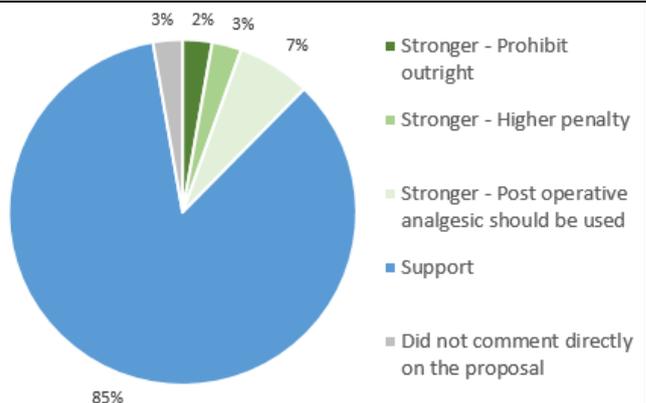
- A vast majority supported the regulation as worded.
- The small number supporting stronger wording requested a higher penalty.



74. Horses – Tail docking (73 submissions)

Proposal: Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian.
 Must only be performed for therapeutic purposes.
 Pain relief must be used at the time of the procedure.

- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested the use of a post-operative analgesic be made mandatory. This was followed by requests for a higher penalty.
- A number of submitters were concerned that the term therapeutic was too soft and needed to be clarified.

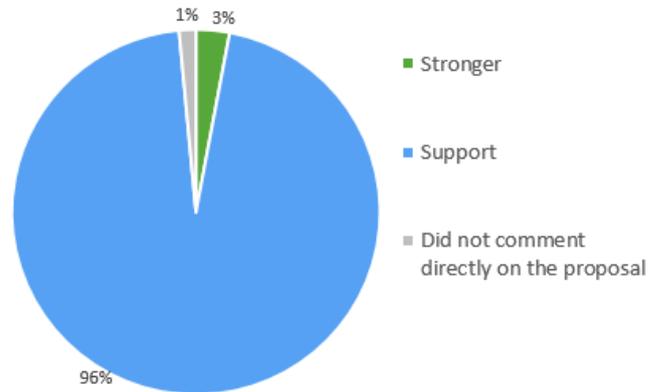


75. Horses – Rectal pregnancy diagnosis (68 submissions)

Proposal: Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian.

This procedure involves an ultrasound probe inserted into the rectum of the animal.

- The vast majority supported the regulation as worded.
- A number of submitters suggested some minor changes to the scope of the procedure, such as widening the scope by including manual pregnancy diagnosis without ultrasound.

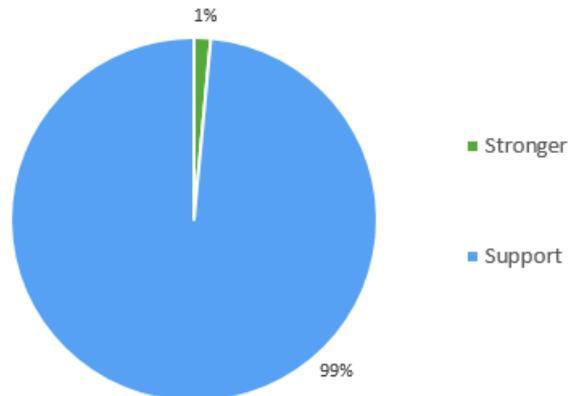


76. Horses – Rectal examination of horses (68 submissions)

Proposal: Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian.

Rectal examination is a diagnostic tool where an operator inserts their hand and arm into the rectum as far as necessary.

- No submissions opposed regulation in this area.
- All submissions, except one, supported the regulation as currently worded.
- One submitter supported the use of pain relief for this procedure.



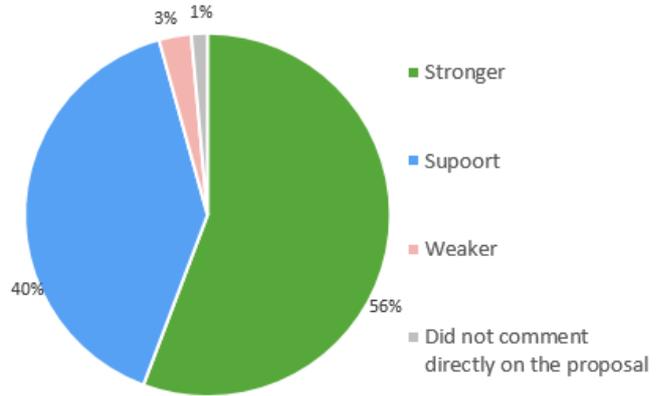
77. Horses – Caslick’s procedure (70 submissions)

Proposal: Creating, opening and repairing a Caslick must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

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

The Caslick’s procedure is the surgical closing of the upper part of the vulva. It is undertaken to avoid faecal contamination and consequent infection and inflammation, in order to maintain a horse’s reproduction.

- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested the procedure be limited to situations where it can only be performed for therapeutic purposes.
- This was followed by prohibiting the procedure outright, and prohibiting offenders from owning or dealing with farm animals in the future.
- A number of submitters proposed changes to the regulation to allow non-veterinarians to undertake some aspects of the procedure. The proposed changes were to reflect the practicalities of performing the procedure on thoroughbred stud farms.

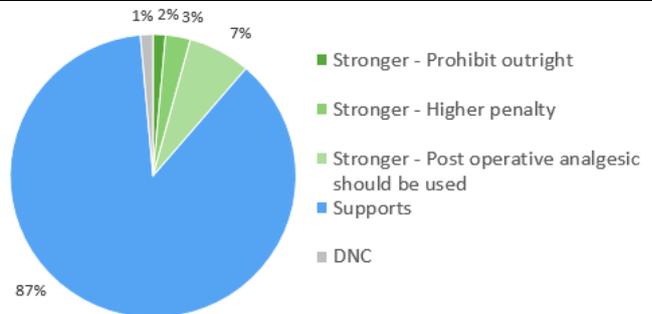


78. Horses – Castration (71 submissions)

Proposal: Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian.

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

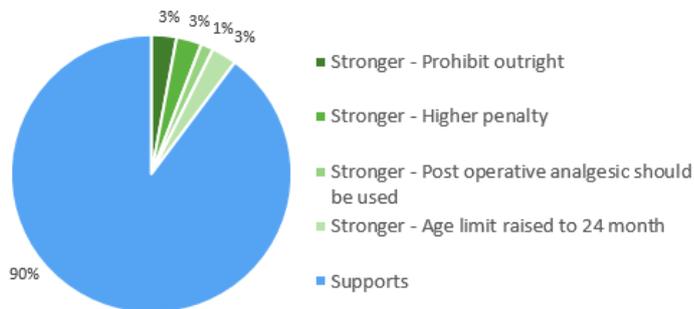
- No submissions opposed regulation in this area.
- The most common stronger position requested the use of a post-operative analgesic be made mandatory. This was followed by requests for a higher penalty.
- A small number of submitters requested that the practice be prohibited outright.



79. Llama and alpaca – Castration (69 submissions)

Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian.
 Pain relief must be used at the time of the procedure.
 Alpaca must not be castrated prior to 8 months of age.
 Llama and guanaco must not be castrated prior to 15 months of age.

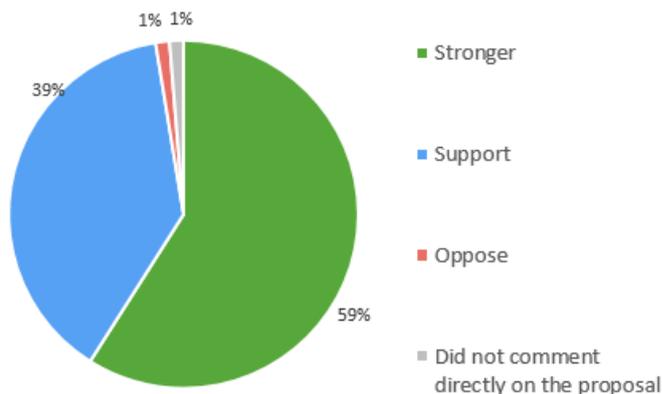
- No submissions opposed regulation in this area.
- Submissions asking for stronger wording requested the use of a post-operative analgesic be made mandatory, a higher penalty, or that the practice be prohibited outright.
- A number of submitters suggested that the age of castration must not be below 24 months, while some submitters suggested there be allowances made to early castrate pushy cria.



80. Pigs – Castration (78 submissions)

Proposal: Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian.
 Pain relief must be used at the time of the procedure.

- The majority supported the regulation as worded or asked for stronger wording.
- Submitters who supported the regulation did so because of the opinion that castration is a painful and stressful procedure with potential for complications.
- The most common stronger position requested that a non-steroidal anti-inflammatory drug or analgesic gel also be required during the procedure, and that non-use would result in an infringement fee.



81. Pigs – Tail docking (75 submissions)

Proposal:

Tail docking – under 7 days:

May be undertaken by anyone

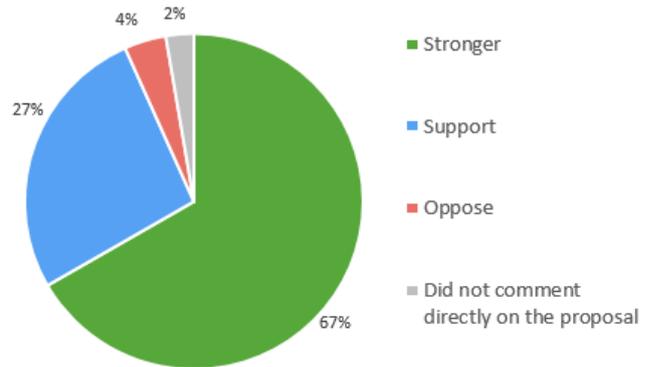
The procedure must create a clear cut and not tear or crush the tissue.

Tail docking – over 7 days:

Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian

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

- The majority supported the regulation, although most asked for stronger wording.
- The most common stronger position requested the regulation be limited to therapeutic reasons, and to be limited to being performed by a veterinarian.
- A small number of submitters requested the regulation to be amended to allow tail docking to be performed by anyone at the time of weaning, and to remove wording about crush/tears as these may be advantageous to reduce haemorrhages.



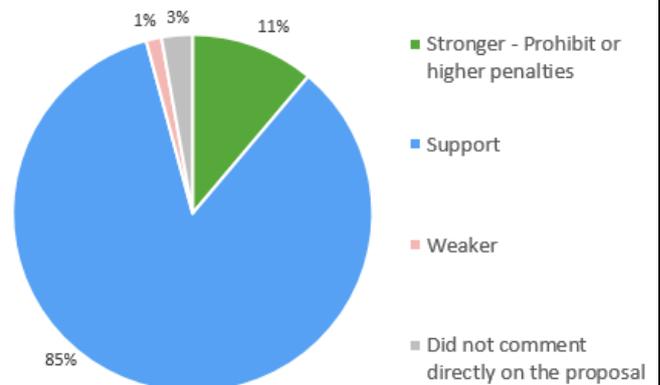
82. Birds – pinioning or otherwise deflighting a bird (72 submissions)

Proposal: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

Must only be performed in the best interests of the animal.

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

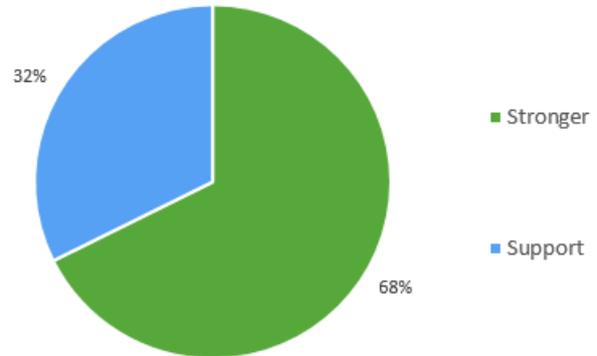
- The majority supported the regulation as worded or asked for stronger wording.
- Submissions asking for stronger wording requested prohibiting the procedure, only allowing it for therapeutic reasons, or applying a higher penalty.
- One submission noted that permanent deflighting is a current requirement to keep exotic waterfowl outdoors and this regulation would prevent that.



83. Poultry – Dubbing (68 submissions)

Proposal: Pain relief must be used at the time of the procedure. Dubbing to be constrained to existing ‘dubbed’ breeds.

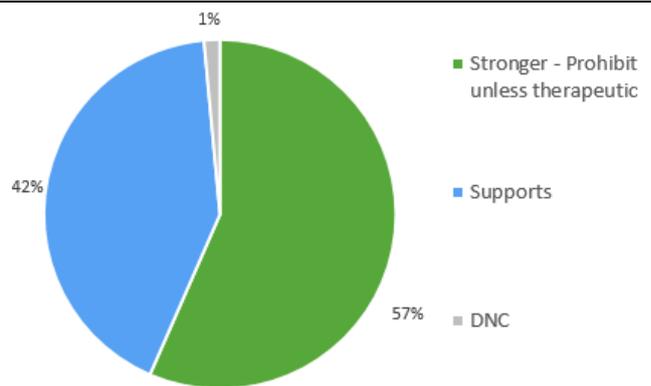
- The majority supported the regulation as worded or asked for stronger wording.
- A number of submissions noted that this procedure is not, and has never been, a feature of the New Zealand commercial poultry industry.
- The most common stronger position requested the procedure be prohibited.



84. Ostrich & Emu – declawing (69 submissions)

Proposal: Prohibit radical declawing of emu chicks

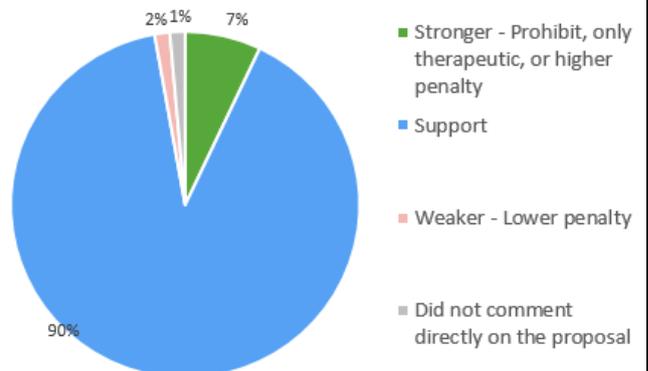
- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested prohibiting declawing except for therapeutic reasons. A small number proposed an outright prohibition and/or a higher penalty.



85. Roosters – caponising (rooster castration) (71 submissions)

Proposal: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. Pain relief must be used at the time of the procedure.

- The majority supported the regulation as worded.
- Stronger positions included outright prohibition, restricting to therapeutic reasons only, or a higher penalty.
- One submitter questioned the level of the proposed penalty.



Appendix B: Summary of submissions on the “Young Calf” proposals

(The proposals consulted on were included in “MPI Discussion Paper No: 2016/12: Proposed Animal Welfare Regulations: Care & Conduct and Surgical and Painful Procedures”)

Overview

MPI received 119 submissions relating to the proposals for young calf management, with broad support for the intent of what MPI is trying to achieve for bobby calf welfare.

Overall, there was support for proposals:

- 43 – Loading and Unloading Facilities
- 44 – Shelter on-farm, before and during transportation and at processing plants
- 46 – Fitness for Transport – Physical Characteristics
- 50 – Transport by sea across Cook Strait prohibited

Further comment and clarifications are needed for proposals:

- 45 – Fitness for Transport – Age
- 47 – Maximum time off feed
- 48 – Duration of Transport
- 49 – Blunt force trauma

Monitoring and communication across the bobby calf supply chain was highlighted by submitters as an area that needed attention through non-regulatory processes. Some submitters promoted the installation of cameras in shelters and stock-trucks. Federated Farms submitted that communication needed to be left outside of regulation to allow parties to manage it in a way that suited them.

In general, the merit of a declaration system was discussed, but most industry groups agreed that it should be left outside of regulation to be managed via customer relations and conditions of supply.

The education and mandatory training of handlers of young calves was a popular theme raised for closer inspection, although none of the submitters commented on how this should be implemented.

There was support for transitional periods from industry groups for facilities, shelter, maximum time off feed, and duration of transport. Most asked for 6-12 months for phase-in, but Fonterra, Dairy Companies Association of New Zealand (DCANZ), and Federated Farmers all submitted that farmers would need 24 months to comply with new facility requirements.

Some submitters questioned whether regulation of the industry was actually needed. The Meat Industry Association (MIA), in particular, submitted that an evidence based approach needed to be taken and until enough evidence had been collected MPI should not change current requirements. NAWAC also submitted for similar reasons that blunt force trauma should not be regulated for as if performed correctly is a humane method of euthanasia.

Levels of infringement were generally seen by the public and advocacy groups to be too low for all regulations, while industry groups generally agreed with the level set or submitted that penalty be set at infringement level instead of prosecutable regulation offence.

The Proposals

43. Loading and unloading facilities

Submitters were supportive of this proposal. Industry groups noted it was important the regulation allowed farmers to find innovative solutions to meet the requirements. There was support that the proposal be amended to clarify that only calves being transported to stockyards or for slaughter would be covered. This will avoid catching calves being picked up in the paddock or transported on-farm.

Support - 55	Amend - 7	Do not support - 5
--------------	-----------	--------------------

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

There was general support for the shelter proposals, although a number of amendments were recommended. In particular, access to fresh water, comfortable bedding, and stocking density were mentioned. Industry and advocacy groups both recommended ensuring that calves had sufficient space to lie down before and during transport.

Support - 47	Amend - 28	Do not support - 2
--------------	------------	--------------------

45. Fitness for transport – age

The intent of this proposal was supported, however submitters differed on the appropriate age and how it should be measured. NAWAC and industry groups supported the 4 day rule as the status quo. While other submitters supported amending this to state ‘since separation from its mother’. DairyNZ and Federated Farmers supported combining proposals 45 and 46 to clarify that all fitness transport requirements must be fulfilled before a calf is transported. Advocacy groups submitted that the age limit should be increased, the most common proposed alternative was 10 days old. SAFE referenced existing European standards that MPI should consider.

Support - 7	Amend – 59	Do not support - 3
-------------	------------	--------------------

46. Fitness for transport – physical characteristics

There was wide support for the proposal. Some concerns were raised about the enforceability of the proposal across the supply chain.

Support - 54	Amend – 4	Do not support - 2
--------------	-----------	--------------------

47. Maximum time off feed

This proposal was supported by industry bodies, however there were differing views about how feasible a minimum feed time prior to pick up would be. The proposal was contentious with advocacy groups and individual submitters who recommended a reduction in the time limit. Views ranged from 2 to 12 hours before slaughter. Meat industry representatives argued that non-regulatory measures should be used to encourage swifter slaughter until more data becomes available to support regulating.

Support - 10	Amend – 57	Do not support - 6
--------------	------------	--------------------

48. Maximum duration of transport

There was support for the proposal's intent but a number of submitters suggested amendments. DairyNZ, MIA and Fonterra submitted that more evaluation of the transport network and evidence was required information to assess value of setting the duration at 8 hours rather than the current standard of 12 hours. They cited potential issues that may arise where processing capacity at certain locations cannot keep up with the large number of calves that may be supplied during peak season. Advocacy groups submitted that the transport duration should decrease.

Support - 50	Amend – 14	Do not support - 4
--------------	------------	--------------------

49. Prohibition of blunt force trauma

There was conditional support for this proposal, on the basis that it include an exemption for emergency situations. The RNZSPCA and NAWAC did not support the proposal, submitting that if performed correctly the procedure remains a humane method of euthanasia.

Support - 47	Amend – 12	Do not support - 2
--------------	------------	--------------------

50. Prohibition of transport by sea across the Cook Strait

There was support for the intent of the proposal. Industry bodies observed that this was not common practice. It was recommended by some submitters that the wording incorporate an exemption for emergency situations.

Support - 53	Amend – 3	Do not support - 3
--------------	-----------	--------------------

Other matters raised

Increased communication, education and monitoring across the supply chain

Submitters highlighted this as an area that should be addressed through non-regulatory means. This included improving supply chain relationships, greater use of 'animal status declarations' and increased education for stock handlers. Some submitters suggested increased monitoring through installation of cameras in shelters and stock-trucks.

Transitional Periods

There was support for transitional periods from industry groups for loading facilities, shelter, maximum time off feed, and duration of transport. This ranged from 6-24 months for delayed commencement. Loading facilities attracted the most support for transitional arrangements.

Enforcement and infringement levels

Submitters raised questions of how the regulations will be enforced, citing potential difficulties in accurately identifying liability within the supply chain and the extent of current proactive enforcement. Advocacy groups also suggested that the proposed infringement fees were too low and that they should instead be \$1,000. Industry groups generally agreed with the prescribed fee level and submitted that some prosecutable offences may be better addressed as infringements if possible.

Opposition to bobby calf 'trade'

Five submitters explicitly requested an end to the bobby calf trade, stating the animals should not be treated as a waste product of the dairy industry and arguing that it is inherently cruel to remove the calves from their mothers at a young age.

Appendix C: Summary of submissions on “Transport of live animals from New Zealand” proposals

(The proposals consulted on were included in “MPI Discussion Paper No: 2016/13: Proposed regulations for the transport of live animals from New Zealand” seeking public submissions on the proposals.)

The Live Animal Export Regulations reflect current Government policy and bring into force sooner amendments already made to the Animal Welfare Act 1999. The regulations move the current policies from a temporary home under the Customs and Excise Act 1996, which requires renewal every three years, to a permanent home under the Animal Welfare Act 1999.

The new provisions brought into force sooner by the Live Animal Export Regulations will improve the welfare of live animals being exported by providing new powers to the Director-General of MPI:

Specifically, these provisions:

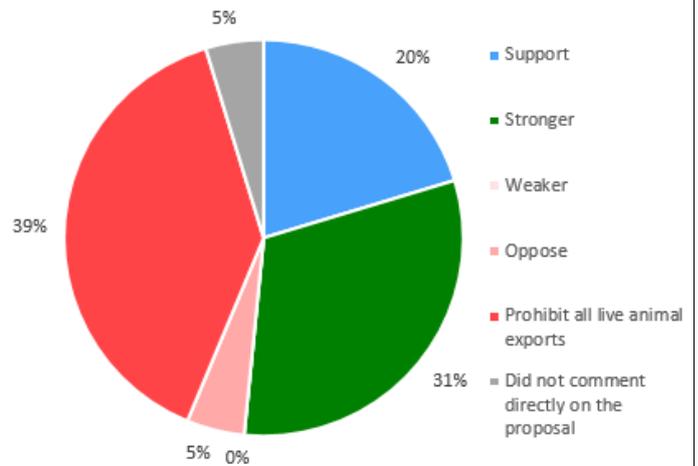
- Provide powers to the Director-General of the Ministry for Primary Industries (MPI) to impose conditions on an Animal Welfare Export Certificate (AWEC) that require exporters to report on the welfare of animals during their journey and for up to 30 days post arrival;
- Expand the matters that the Director-General of MPI can or must consider when assessing an application to include the ability to take into account information provided by exporters on welfare of animals previously exported;
- Allow the Director-General of MPI to refuse, revoke or amend an AWEC; and
- Repeal requirements for the Director-General of MPI to create and consult on guidance material for the export of animals. This provision is to be repealed as legislation is not necessary to allow MPI to issue guidance material. MPI can and will continue to work with stakeholders to develop guidance material.

MPI received 60 submissions on the live animal export proposals. Submissions from the general public principally sought a total ban on the export from New Zealand of all animals, for any purpose. Submissions from industry were largely supportive of the regulations.

The Live animal export proposals were also discussed with the Animal Trade Advisory Council (ATAC) who represent a significant number of live animal exporters. ATAC generally supports the regulations.

Live animal exports

- Submissions were split almost evenly between support and opposition of the regulation.
- Several submissions addressed the topic of live animal exports generally, rather than commenting on the specific wording of proposed regulations. These submissions were categorised as 'DNC'.
- Submitters who requested a full prohibition on live animal exports for any reason were considered to be opposed to the regulations.
- Most industry and advocacy organisations supported the regulations.
- Submissions asking for stronger wording wanted the regulation to require extra officials to travel with the animals for the purpose of ensuring their welfare, or an increased penalty for non-compliance.
- One submission was opposed to the regulation bringing section 43 into force as they did not perceive that live animal exports were already well-managed and not a reputational risk to New Zealand's trade.



Appendix D: Summary of public meetings

MPI consulted on 91 proposed animal welfare related regulations over a five week period during April and May 2016.

Consultation included six public meetings throughout New Zealand in addition to an invitation to all interested parties to provide written submissions on the consultation document. The public meetings were held in Wellington, Palmerston North, Auckland, Waikato, Invercargill and Christchurch.

Please note: The comments and questions expressed in this appendix are a summary of those issues and concerns put forward by attendees at six public meetings hosted by MPI. The notes below reflect MPI's general response to the comments and questions put across all six workshops and are not intended to provide a comprehensive record of the dialogue at any one meeting.

General Questions

Proposal	General: Timeframe
General Comment	A number of people at the workshops felt that the 5 week consultation period is too short to thoroughly consider each proposal, and that therefore consultation is not being conducted in good faith.
Common Questions	<ul style="list-style-type: none"> • Is there any chance that the consultation period will be extended? • What is the reasoning behind the short timeframe? • When will regulations be put in place?
MPI Response	<p>MPI has already worked with NAWAC, the Veterinarian Council of New Zealand and the Royal New Zealand Society for the Prevention of Cruelty to Animals (RNZSPCA) to consider the 1200 minimum standards in the existing 18 codes of welfare to identify suitable matters for regulations.</p> <p>MPI has also had workshops with animal advocacy groups, companion animal groups, farming and industry groups and other stakeholders with an interest in animals in order to develop these proposals.</p> <p>The public consultation is the next step to ensure we make the best rules possible.</p> <p>MPI expect that some of the regulations relating to young calves may be in force in time for the spring calving season, and the majority of other proposals will be progressed in 2017.</p>

Proposal	General: Compliance
General Comment	<p>Many of the attendees said that there are not enough compliance officers on the ground enforcing the Act and regulations. A number of people were concerned that there is a lack of proactive investigation, and that there should be more un-announced inspections of farms - especially intensive indoor farms.</p>
Common Questions	<ul style="list-style-type: none"> • How will these regulations be enforced? • Will the severity of an animal welfare case lead to a higher prosecution? • Will MPI undertake more un-announced inspections? • How will animal welfare offences be identified if animals are locked away in factory farms?
MPI response	<p>In the 2015/16 Budget, Government provided \$10 million over four years to support the implementation of the Animal Welfare Amendment Act, including increasing MPI's compliance and enforcement capability by recruiting an additional six specialist Animal Welfare Inspectors to bring the total to 17.</p> <p>MPI also has more than 25 cross-warranted compliance officers, such as fisheries officers, and over 200 veterinarians at meat processing plants, all of whom are also warranted Animal Welfare Inspectors. These MPI veterinarians respond to animal welfare issues in animals transported and presented for slaughter. They work closely with MPI's compliance and enforcement team.</p> <p>MPI's enforcement partner, the RNZSPCA, has approximately 90 Animal Welfare Inspectors around the country.</p> <p>MPI is undertaking an increased number of initiatives to proactively inspect farms. For example, 1200 farms (beef, sheep, deer, horse, and dairy farms) will have an on farm verification audit in the next year. These will be conducted by MPI veterinarians and animal welfare will be a significant component of these verification audits.</p> <p>Additionally, MPI has undertaken to proactively inspect all of New Zealand's large pig farms over the next 3 years.</p> <p>However, our system of animal welfare also relies on all New Zealanders looking out for our animals and reporting any concerns. MPI has undertaken a proactive campaign encouraging people to report animal welfare concerns to a central 0800 number.</p> <p>MPI will investigate any complaints it receives.</p>

Proposal	General: Animal Welfare Commissioner
General Comment	A number of people argued that MPI experiences a conflict of interest as they are charged with both growing and protecting our primary industries. Some people felt that MPI should not be responsible for animal welfare.
Common Questions	<ul style="list-style-type: none"> • Why is there no independent Animal Welfare Commissioner?
MPI response	<p>It is fundamental to the growth of our economy to ensure that we have world class standards of animal welfare.</p> <p>Further, to ensure there is independence in the animal welfare system NAWAC was set up to provide independent expert advice to the Minister on animal welfare issues. NAWAC includes people with expertise in animal welfare and those with an interest in animal welfare in order to have a balanced view of issues that may arise.</p> <p>Codes of Welfare are developed and recommended to the Minister for Primary Industries by NAWAC under the Act. Codes of Welfare set out Minimum Standards of care for specific animal species.</p> <p>Under new changes to the Act, NAWAC will run the process of recommending future areas for regulation at the same time that they develop or review Codes of Welfare.</p> <p>Animal welfare inspectors are highly trained professionals who care passionately about animal welfare and doing their job well. They are subject to the state sector Code of Ethical Conduct, similar to the New Zealand Police. MPI veterinarians are also bound by the Veterinary Council Code of Professional Conduct which requires veterinarians to have a special duty to protect animal welfare and alleviate animal suffering under both the Animal Welfare Act 1999 and the Veterinarians Act 2005.</p> <p>Growth in value and animal welfare standards can work together. Providing assurance to consumers about the animal welfare standards of animal products is playing an increasingly important role in access to high value markets.</p>

Proposal	General: Budget
General Comment	A number of attendees criticised the lack of funding being given to the RNZSPCA. Many people wanted to know where the money allocated for animal welfare in Budget 2015/2012 will go.
Common Questions	<ul style="list-style-type: none"> • Will increased funding be given to the SPCA? • Where is the money being directed? • Where will money received from infringements go to?
MPI response	<p>MPI provides funding to the SPCA on an annually negotiated basis for agreed services (primarily training and enforcement).</p> <p>In the 2015/2016 Budget, Government provided \$10 million over four years to support the implementation of the Animal Welfare Amendment Act, which includes increasing MPI's compliance and enforcement capability. So far money has gone into recruiting extra animal welfare inspectors, training cross-warranted compliance officers, education, and the development of these proposed regulations.</p> <p>As is standard for infringement schemes, money from infringement fees is directed into a central government fund administered by The Treasury. This ensures that departments do not have an incentive to issue infringements to generate revenue for their department.</p>

Proposal	General: Infringement Scheme
General Comment	Some participants were confused about how infringements will be enforced, and what will happen to repeat offenders.
Common Questions	<ul style="list-style-type: none"> • What will happen to repeat offenders? Will they continue to receive infringement fines or will they eventually be prosecuted? • How were the infringement fees determined? • Will there be a three strike system where on the third offence someone will receive a criminal conviction? • How far back will the chain of causation go?
MPI response	<p>Repeat offenders will be able to be identified from the animal welfare infringement database. MPI and RNZSPCA infringement policies will seek to escalate responses to repeat offending. This may include taking a prosecution where the situation warrants it.</p> <p>The proposed infringement fees were arrived at by looking at existing comparable legislation (e.g. fisheries, biosecurity, and dog control infringement schemes) and the level of harm and complexity of the specific offence. Infringements are only appropriate for relatively straightforward and low to medium level offending. They have been developed as another tool to be used by the regulator for lower level offending that does not warrant prosecution. MPI and RNZSPCA will continue to take prosecutions as appropriate.</p>

Proposal	General: Disparity between regulations for different animals
General comment	Attendees noted that there were different requirements for different species or procedures that had similar pain levels.
Common questions	<ul style="list-style-type: none"> • Why can some procedures be performed by ‘any person’, but some require a vet? • Why do some procedures require pain relief, when some do not?
MPI response	<p>MPI acknowledges that there are some differences between species and procedures. Some of the differences reflect differences in the potential benefits to the animals. For example, tail docking sheep provides benefits to the animal by reducing flystrike while tail docking in horses does not provide any additional benefits to the animal that cannot be achieved by alternatives such as tail plaiting or bandaging. Each regulation reflects scientific knowledge, available technology and good practice for each species at this time.</p> <p>In terms of having painful procedures performed by non-vets, the proposals recognise the fact that there are a number of non-vet practitioners who are highly skilled and specialised at these procedures. The wording ‘any person’ was used to leave scope for those kinds of people to continue performing the procedure. Further work needs to be undertaken to understand if it is necessary or feasible to develop some type of approval / accreditation process for some of these procedures. Where pain relief is required there will be vet oversight, as the vet will need to authorise the pain relief for the procedure.</p> <p>In terms of requiring pain relief, MPI clarified that while care and conduct proposals are generally just transferring the minimum standards into regulations, some of the surgical and painful procedure proposals are ‘raising the bar’ above the current minimum standards. The reason for ‘raising the bar’ for some procedures is because the Painful Husbandry Procedure code of welfare 2005, which sets out many of the requirements for surgical and painful procedures, is over 10 years old. There was also a commitment in that code to consider pain relief when the procedures were next reviewed. In the time since it was developed, the science of pain and pain relief has advanced as well as societal expectations.</p>

Care and Conduct Proposals – excluding young calf proposals

Proposal	1. All Animals – Electric prodders
General Comment	<p>The restrictions on use should include the restrictions in the transport code of welfare: that the animal must have room to move away from the prodder, the safety of a person is at risk, or their use is essential to move a difficult animal.</p> <p>Some people also raised that they need to occasionally use an electric prodder when loading large rams or pigs and wouldn't like to see this penalised.</p> <p>The opinions that electric prodders shouldn't be allowed at all, that circuses shouldn't have an exception, and that 100kg was too light, and too heavy, were also heard.</p>
Common Questions	
MPI response	<p>MPI will consider the further restrictions as in the Transport Code of Welfare.</p> <p>Electric prodders are an important health and safety tool when dealing with large animals. That is not to say they should be used often but MPI recognises that having electric prodders available as a safety tool is important.</p> <p>MPI invited submissions on this point to help ensure that the correct balance is achieved.</p>

Proposal	2. All Animals – Use of goads
General Comment	<p>The specific list of sensitive areas was questioned and amendments suggested. Some people also expressed the opinion that goads and whips shouldn't be allowed at all.</p>
Common Questions	<ul style="list-style-type: none"> • Why has 'nose' not been included when it is in the minimum standard? • Why isn't head included? • Why aren't all genitals included? Wouldn't it be simpler to just say don't prod in genitals?
MPI response	<p>MPI wanted to make this regulation very clear that there is no reason to prod animals in these sensitive areas. Early testing with stakeholders suggested to MPI that there may be situations where it is acceptable to use a goad to tap the nose or head of a pig for example, in order to get them to back up in races or yards. In order to avoid bringing in a subjective qualifier about 'appropriate force' the proposal only mentioned the areas that there is clearly no reason to prod.</p> <p>The suggestion to simply use the catch all 'genitals' instead of listing separate genital areas is a good one and will ensure no genital areas are inadvertently missed.</p> <p>MPI invited submissions on this point to help ensure that the correct balance is achieved.</p>

Proposal	3. All Animals – Twisting an animal’s tail
General Comment	<p>Using the tail is a very effective way of moving cattle forward and much better than alternatives.</p> <p>Tail breaking is a deliberate action near the end of the tail, quite separate from tail handling near the base of the tail.</p> <p>Twisting is a pre-cursor to tail breaking. Tail twisting should therefore be regulated.</p>
Common Questions	<ul style="list-style-type: none"> • If an animals tail falls off or is damaged by the animal itself, how will it be proven that it was not the farmer who inflicted this injury? • Where is the line drawn with tail twisting when it comes to health and safety?
MPI response	<p>MPI noted that breaking an animal’s tail is an offence that will remain prosecutable under the Act, therefore it will not be included as a regulation. The aim of this regulation is to target risky behaviour that may lead to tail breaking by making it an offence to twist a tail.</p> <p>MPI acknowledged that some use of the tail to control an animal is considered acceptable, but there is a fine line as to when this would become an offence.</p> <p>MPI encouraged submissions on whether the line between acceptable use of the tail and risky behaviour that is below tail breaking can be defined clearly enough to become an offence.</p>

Proposal	4. Dogs – Pinch and prong collars
General Comment	<p>General agreement they should be banned, no exceptions. Sale should be banned also. Some suggested skilled trainers only. Anyone who needs to use one of these shouldn’t be training dogs.</p> <p>It was noted that there are pinch and prong harnesses as well.</p>
Common Questions	
MPI Response	<p>The proposal reflects the current prohibition on use in the Dogs code of welfare 2010.</p>

Proposal	5. Dogs – Injuries from collars and tethers
General Comment	Questions were asked about how serious ‘cuts’ and ‘abrasions’ needed to be before an infringement would be issued.
Common Questions	<ul style="list-style-type: none"> • If my dog scratches himself will I get an infringement? • Shouldn’t this cover all animals injured by collars or tethers?
MPI Response	<p>As with all animal welfare complaints the appropriate response will depend on the situation. Animal Welfare Inspectors make these calls currently when deciding if the situation requires education, a warning, or prosecution.</p> <p>MPI and RNZSPCA infringement processes will offer guidance to the animal welfare inspectors. Recommendations to infringe will also be directed to a district or national manager for a decision. This will help ensure consistency and appropriateness of the response.</p> <p>MPI has asked the question if this proposal should cover all species and will consider the responses through submissions.</p>

Proposal	6. Dogs – Muzzling a dog
General Comment	Some attendees recognised that in some scenarios a dog must be muzzled to prevent it from biting someone, for example a vet. This muzzling prevents the dog from panting but there are some legitimate scenarios that a dog may not be able to pant in the interest of health and safety. The wording of the regulation may need to be changed.
Common Questions	
MPI Response	MPI are aware that there may be some legitimate scenarios where a non-bite muzzle will be used, so it would be very helpful to have submissions on when these occur and how a regulation could be worded to allow this legitimate use.

Proposal	7. Dogs – Dry and shaded shelter
General Comment	<p>The chaining of a dog for an extended period of time was raised by a number of attendees. Many felt that the period of time a dog is chained for should be regulated, as well as the amount of space a dog has access to when chained.</p> <p>A dog that is chained for life and does not have enough space to move around in will have both compromised physical welfare and mental welfare.</p>

Common Questions	<ul style="list-style-type: none"> Why have you not included space or length of time in the definition of shelter for a dog?
MPI Response	<p>Life chaining of a dog would fall under an offence against the Act, and therefore there is no need to regulate this as doing so may down-grade the seriousness of the offence.</p> <p>It is difficult to regulate the specific amount of space a dog should have access to as there are a range of different settings that each individual dog will be in. For example, a farm dog that has been out working on the farm all day may need less space when tethered than a dog that has been tethered while its owners were at work. The size and breed of individual dogs also impact the amount of space that they require.</p>

Proposal	8. Dogs – Dogs left in vehicles
General Comment	General support for proposal. Some concern that it could pick up dogs that are not in distress.
Common Questions	<ul style="list-style-type: none"> My dog drools a lot, will I be fined if I pop into the shops for five minutes?
MPI Response	<p>There are around 300 complaints per year about dogs in cars. Animal welfare inspectors already have to make hard decisions about a dog's level of distress, before deciding to break a car window. This new proposal would not change that.</p> <p>Both MPI and RNZSPCA processes involve an internal check on infringements to ensure the situation warranted an infringement and that infringements are being issued consistently.</p>

Proposal	9. Dogs – Dogs on moving vehicles
General Comment	Some attendees suggested that it may be better to specify a maximum speed that a vehicle can travel with a dog untethered on the back, as dogs are just as likely to be hurt on vehicles on farm as they are on public roads.
Common Questions	<ul style="list-style-type: none"> Will police be able to enforce this?
MPI Response	MPI recognised that the current proposal came out of the code of welfare, which did not specify a speed. Speed limits may be difficult to enforce on private roads, however MPI may look into this further. There is also the added difficulty that MPI and RNZSPCA animal welfare inspectors do not have the legal power to stop a moving vehicle for enforcement purposes.

	<p>Police are deemed to be Animal Welfare Inspectors as well so have the power to enforce the regulations, although it is not envisaged that police would be the primary enforcers of the new animal welfare offences.</p> <p>MPI invited submissions on this point to help ensure that the correct balance is achieved.</p>
--	--

Proposal	10. Dogs & Cats – Drowning dogs & cats
General Comment	Concern that some other methods of killing animals are just as bad if not worse than drowning a cat or a dog.
Common Questions	<ul style="list-style-type: none"> • Why does this regulation only cover cats and dogs?
MPI Response	<p>MPI noted that specific problem areas were targeted in the development of these regulations. Drowning of cats and dogs has been used in the past as a means of disposing of unwanted animals and MPI wanted to give visibility to the unacceptable nature of this practice.</p> <p>Because these proposals reflect minimum standards in existing codes of welfare, it has been limited to cats and dogs. However, MPI encouraged submissions on whether other animals should be covered by a similar regulation.</p> <p>MPI notes that drowning most animals (including cats and dogs) would be an offence under the Act, in that it is ‘killing an animal in a manner that causes unnecessary pain or distress’ (section 12c). Creating a regulation would make this explicit but lower the penalty for someone committing this offence.</p> <p>MPI asked for submissions on the relative merit of making an explicit statement prohibiting killing by drowning, but having a lower penalty, versus leaving it implicit under section 12(c) of the Act, but having the higher penalty.</p>

Proposal	11. Eels – Insensible for desliming
General Comment	Was not raised in public meetings.
Common Questions	
MPI Response	

Proposal	12. Crabs, rock lobster, and crayfish – Insensible before being killed
General Comment	Was not raised in public meetings.
Common Questions	
MPI Response	

Proposal	13. Goats – Tethering requirements
General Comment	Many people supported a full ban on the tethering of goats roadside. It was argued that goats cannot display patterns of natural behaviour if they are tethered roadside for long periods of time, and that they are naturally herd animals so should have a companion.
Common Questions	<ul style="list-style-type: none"> • Can you ban the roadside tethering of goats? • How can a tethered animal have its physical and behavioural needs met?
MPI Response	<p>MPI recognised that a number of submissions had been received in relation to this issue. NAWAC had considered the roadside tethering of goats and concluded that if they are provided with access to food, water and shelter, as per the proposal, they are satisfied that the physical and behavioural needs of the animal can be met. While it is not recommended to tether goats' roadside, it is a common practice.</p> <p>MPI recognised that the regulations being consulted on were lifted from minimum standards, and therefore prohibiting goat tethering had not been included.</p> <p>MPI encouraged submissions on these and other issues, including whether goats should have access to a companion animal, to ensure the correct balance is achieved.</p>

Proposal	14. Horses – Use of a whip, lead or any other object
General Comment	A concern was raised that allowing the use of whips, leads and goads in some cases may encourage them to be used in inappropriate ways. It was recognised that people often hit their animals on the body or legs rather than just sensitive areas.
Common Questions	<ul style="list-style-type: none"> • Why are whips, leads and other objects allowed to be used on other areas of an animal? • Why is the use of these not banned? • Will you ban Rollkur (Hyperflexion in the neck)?
MPI Response	MPI recognised that when working with animals there is an acceptable level of force that is often needed to be used to direct an animal to do

	<p>certain things. There are definitely cases where the extent of the force used is not acceptable, such as the use of goads and electric prodders on sensitive areas, and serious cases of this can fall under a prosecution under the Act. It is current accepted practice that whips and goads be used on certain parts of an animal in certain circumstances providing it does not lead to any harm to the animal. MPI encouraged submissions on this, and suggestions to what the regulation should cover.</p> <p>Rollkur is covered under the Horses and Donkeys Code of Welfare as a training technique.</p>
--	---

Proposal	15. Horses – Injuries from equipment such as halter, head ropes, and saddles
General Comment	General agreement but questions about the severity of injuries that would trigger an infringement.
Common Questions	<ul style="list-style-type: none"> I agree with injuries from tack, but what about a weight limit for riders?
MPI Response	<p>As with current complaints an animal welfare inspector on the scene has to make a judgement about the appropriate response, currently education, warning, or prosecution. Regulations will give the inspector a couple more tools to intervene earlier before a situation becomes so severe that prosecution is warranted. Training and protocols help to guide the inspector in their decision. Recommendations to infringe or prosecute will also have to be reviewed and approved internally to ensure appropriateness and consistency.</p> <p>The appropriate weight loading on a horse will vary depending on breed, age, size, and the type of work being undertaken. There are too many variables to create a simple regulation that would be fair and effective. The Horses and Donkeys Code of Welfare includes a minimum standard 8 which states: (a) Horses must be handled and trained at all times in such a way as to minimise the risk of pain, injury or distress and (b) horses must not be worked at such an intensity that is likely to cause exhaustion, heat stress, injury or distress. Breach of those minimum standards may support a prosecution under the Act in serious cases.</p>

Proposal	16. Horses & donkeys – Tethering requirements
General Comment	<p>Some suggestions to ban tethering of all animals.</p> <p>Why hasn't the 15 hour time limit from the minimum standard been included?</p> <p>How constant is 'constant access'? What if I've just given them water and an inspector turns up and they've drunk it all?</p>
Common Questions	<ul style="list-style-type: none"> • Why are the tethering requirements for horses and goats different to dogs? • Does this mean when I tie a horse up in a horse float it must have food and water?
MPI Response	<p>'Constant access' does mean at all times. However, as presently animal welfare inspectors need to investigate a situation and make a decision about the appropriate response. If a conversation reveals the horse has just had water, and there isn't any reason to suspect the horse is short of water, then you would expect the matter to end there. Any recommendation for infringement needs to be reviewed and approved internally to check its appropriateness and ensure consistency.</p> <p>Clarification that the definition of tethering in the proposals (and in the horses and donkeys code of welfare) relates to tethering for grazing.</p> <p>Time limits are very difficult to enforce without round the clock monitoring, so in order to keep the regulation clear it focuses on aspects that need to be constantly present.</p> <p>Horses and goats are generally tethered for different reasons to tethered dogs. The proposals focus on the most frequent issues that crop up in complaints. For tethered dogs that is injuries; for horses and goats access to food, water and shelter are more common.</p>

Proposal	17. Layer hens – Opportunity to express normal behaviours in housing systems
General Comment	<p>Many attendees argued that colony cages do not allow layer hens to express patterns of natural behaviour.</p>
Common Questions	<ul style="list-style-type: none"> • How can hens in a colony cage express normal behaviour?
MPI Response	<p>The starting point for these proposals is to lift existing standards into regulations to make them more enforceable. If you don't believe the existing standards are adequate please tell us that in your submission.</p> <p>In 2012 NAWAC reviewed the Layer Hens Code of Welfare and considered each housing system for hens and the welfare impacts. They concluded that colony cages had better welfare outcomes than battery cages because birds in colony cages are able to express some patterns of natural behaviour. Colony cages had overall similar animal welfare</p>

	<p>outcomes compared to barn systems and free-range systems. There was no system out of these three systems that had explicitly better or worse outcomes for hens, so NAWAC consider colony cages acceptable for use.</p> <p>Hens in a colony cage have the ability to nest, perch, scratch, peck and dust bath.</p>
--	--

Proposal	18. Layer hens – Stocking densities
General Comment	Questions about whether the stocking densities for systems were too high and if they would let hens express natural behaviours, particularly for colony cages.
Common Questions	<ul style="list-style-type: none"> • How can you say it is adequate to confine a hen to 750cm², little more than an A4 sheet of paper for their entire life?
MPI Response	<p>The starting point for these proposals is to lift existing standards into regulations to make them more enforceable. If you don't believe the existing standards are adequate please tell us that in your submission.</p> <p>NAWAC considered each housing system for hens and the welfare impacts. They concluded that colony cages had better welfare outcomes than battery cages because birds in colony cages are able to express patterns of natural behaviour. Colony cages had overall similar animal welfare outcomes compared to barn systems and free-range systems. There was no system out of these three systems that had explicitly better or worse outcomes for hens, so NAWAC consider colony cages acceptable for use.</p> <p>A layer hen occupies less than 750cm². Because hens tend to flock together the additional space is aggregated and allows hens the opportunity to make use of open space to stretch and flap.</p>

Proposal	19. Layer hens – Housing equipment and design
General Comment	Layer hens cannot express normal behaviour in a colony cage. They should be made free-range as it is cruel to keep them in such a small cage.
Common Questions	<ul style="list-style-type: none"> • Why should colony cages be allowed when there are better systems such as free-range systems?
MPI Response	<p>The starting point for these proposals is to lift existing standards into regulations to make them more enforceable. If you don't believe the existing standards are adequate please tell us that in your submission.</p> <p>NAWAC considered each housing system for hens and the welfare impacts. They concluded that colony cages had better welfare outcomes</p>

	<p>than battery cages because birds in colony cages are able to express patterns of natural behaviour. Colony cages had overall similar animal welfare outcomes compared to barn systems and free-range systems. There was no system out of these three systems that had explicitly better or worse outcomes for hens, so NAWAC consider colony cages acceptable for use.</p> <p>Free range systems meet a hens behavioural needs in a different way but aren't necessarily better in every way. For instance they can have a higher incidence of disease or injury.</p>
--	--

Proposal	20. Layer hens – Induced moulting
General Comment	General support for the proposal.
Common Questions	
MPI Response	

Proposal	21. Llama & Alpaca – Injuries from equipment such as halter, head ropes and packs
General Comment	General support for the proposal.
Common Questions	<ul style="list-style-type: none"> • How severe do 'cuts and abrasions' need to be to trigger a response under the regulation.
MPI Response	As with current complaints an animal welfare inspector on the scene has to make a judgement about the appropriate response, currently education, warning, or prosecution. Regulations will give the inspector a couple more tools to intervene earlier before a situation becomes so severe that prosecution is warranted. Training and protocols help to guide the inspector in their decision. Recommendations to infringe or prosecute will also have to be reviewed and approved internally to ensure appropriateness and consistency.

Proposal	22. Llama and alpaca – Companion animals
General Comment	Some participants argued that it should not only be llama and alpaca that require a companion animal.
Common Questions	<ul style="list-style-type: none"> • Why should llama and alpaca have special requirements for companion animals but not any other animal?
MPI Response	Llama and alpaca are extremely social animals, more so than other animals, and isolation causes them extreme stress. Llama and alpaca should be kept with another camelid when they are young. A companion for an adult animal does not have to be another camelid.

Proposal	23. Llama & Alpaca - Offspring (Cria) camelid companions
General Comment	General support.
Common Questions	<ul style="list-style-type: none"> • Why do cria have a special requirement for camelid companions?
MPI Response	Llama and alpaca are extremely social animals, more so than other animals, and isolation causes them extreme stress. Llama and alpaca without companions that are raised by humans can develop ‘Berserk Llama Syndrome’ which causes them to be dangerously aggressive towards humans.

Proposal	24. Pigs – Dry sleeping area
General Comment	General support.
Common Questions	<ul style="list-style-type: none"> • How dry is dry? What if the area has just been washed down?
MPI Response	<p>This proposal is mostly targeting complaints about pigs in a backyard or small sty that might be up to their bellies in muck and not have the option to get out of it if they want to.</p> <p>Just as they do now, animal welfare inspectors need to investigate a situation and make a decision about the appropriate response. If a conversation reveals the area has just been washed, and there isn’t any reason to suspect that the area will not soon be dry, then you would expect the matter to end there. Any recommendation for infringement needs to be reviewed and approved internally to check its appropriateness and ensure consistency.</p>

Proposal	25. Lying space for grower pigs
General Comment	General support. Some people questioned the amount of space for grower pigs and suggested there should be more. There were also suggestions that grower pigs needed an enriched environment rather than bare grower sheds, and that all pigs should be raised outdoors.
Common Questions	
MPI Response	The starting point for these proposals is to lift existing standards into regulations to make them more enforceable. If you don’t believe the existing standards are adequate please tell us that in your submission.

Proposal	26. Dry sow stalls
General Comment	General support for the proposal. Some questions about how MPI will monitor compliance.
Common Questions	
MPI Response	MPI has agreed to undertake pro-active inspections of all large piggeries in NZ over the next three years. Compliance with the Pigs Code of Welfare and any new regulations would be the focus of these inspections.

Proposal	27. Pigs – Farrowing crates
General Comment	A number of attendees argued that pigs in farrowing crates cannot express natural behaviours. Pigs have been bred so large that the size of farrowing crates will have to increase, and this is why there are high rates of piglet mortality.
Common Questions	<ul style="list-style-type: none"> • Why are you not banning the use of farrowing crates?
MPI Response	<p>Farrowing crates provide for a balance between both sow and piglet welfare. There are currently no practical alternative systems that allow greater freedom for the sow without increasing piglet mortality.</p> <p>In 2016 NAWAC provided advice to the Minister that there had been no change in significant scientific knowledge, available technology and good practice, since the Pigs Code of Welfare was issued in 2010. Based on this, NAWAC advised the Minister that there was no need to formally review the Pigs Code of Welfare with regard to the use of farrowing crates.</p> <p>MPI is supporting New Zealand research into improved farrowing practices. The Government will consider a change where clear evidence of a better alternative emerges.</p>

Proposal	28. Pigs – Provision of nesting material
General Comment	General support, although tempered with the view that farrowing crates should not be used at all. People felt sows should have chance to build a nest.
Common Questions	
MPI Response	

Proposal	29. Rodeos – Fireworks
General Comment	A number of people were concerned that fireworks were allowed to be used around other animals, but not in rodeo.
Common Questions	<ul style="list-style-type: none"> • Would MPI consider banning the use of fireworks around all animals?
MPI Response	Banning the use of fireworks generally is outside the scope of the Animal Welfare Act.

Proposal	30. Exotic animals – Used in circuses
General Comment	All exotic animals in circuses should be banned. There are currently no exotic animals in circuses, so banning them now would be a good idea.
Common Questions	<ul style="list-style-type: none"> • Why is there not a straight ban on the use of exotic animals if there is no need to have them in New Zealand?
MPI Response	<p>MPI noted that the Animal Welfare Act does not allow an activity to be banned unless it does not meet the specific needs of an animal. Exotic animals have a very broad definition, and it is difficult to say that a circus cannot provide for the welfare needs of every single exotic animal. It is easier to put restrictions in place that allows a circus owner to have animals present if they can adequately meet their needs. This allows animals who may be behaviourally enriched in a circus to perform in them.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that the regulation achieves the correct balance.</p>

Proposal	31. Cattle – Milk stimulation
General Comment	Most people agreed that this was an outdated practice that should be prohibited. However, some people suggested that injecting oxytocin could be more distressing than this practice.
Common Questions	
MPI Response	MPI considers the practice to be unnecessary given the alternatives, but will consider information provided by submissions.

Proposal	32. Cattle and sheep – Vehicular traction in calving or lambing
General Comment	General support. A few attendees recognised that the wording for the proposal was slightly ambiguous. A number of people suggested that an exception for emergencies should be made.
Common Questions	<ul style="list-style-type: none"> • Will the proposal cover a vehicle that is used as an anchor but is not actually moving?
MPI Response	MPI explained that as long as the vehicle is not moving it can be used as an anchor.

Proposal	33. Cattle and sheep – Ingrown horns
General Comment	<p>People asked if they would be in breach of the proposed regulation when they muster animals they haven't seen for six months or more and some of them have ingrown horns.</p> <p>Several people stated that this regulation should also cover goats.</p>
Common Questions	
MPI Response	<p>The proposal is not intended to penalise extensive pastoral systems where frequent contact with the animals is not the norm. MPI considers that 'failure to treat' includes the implication that reasonable time has been allowed to identify the problem and treat it i.e. treated in the yards after mustering.</p> <p>The proposal was put forward around cattle and sheep because MPI receives most ingrown horn complaints about those animals. However, MPI was not aware of any reason why the proposal shouldn't cover goats.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that the regulation achieves the correct balance.</p>

Proposal	34. Stock transport – Cuts and abrasions
General Comment	<p>Attendees suggested that the wording for this proposal was ambiguous. Wording should be more specific to ensure that accidental cases of small cuts and abrasions not be covered in the regulation.</p> <p>Some attendees suggested that there be a regulation relating to cuts and abrasions caused from shearing as well.</p>
Common Questions	<ul style="list-style-type: none"> • Who will be liable in the case of back-rub? The stock transporter or the farmer? • How bad does a cut have to be to be liable for this?
MPI Response	MPI explained that this regulation is primarily targeting back-rub and that the severity of back rub would need to be a factor when an animal welfare inspector is determining the appropriate response. Any

	<p>recommendation for infringement needs to be reviewed and approved internally to check appropriateness and ensure consistency.</p> <p>MPI noted that there is a minimum standard in the Sheep and Beef code that relates to cuts from shearing and will consider if this should be included as a separate regulation.</p> <p>The existing offences in the Animal Welfare Act will continue to cover severe cuts and abrasions from any cause.</p>
--	---

Proposal	35. Stock transport – Animals with ingrown horns
General Comment	General support. Some sentiment that the proposal should be broader and cover 'injury' rather than single out the specific conditions in the stock transport proposals.
Common Questions	
MPI Response	<p>The regulations need to be specific in order to be clear and unambiguous so that people in charge of animals know their responsibilities and animal welfare inspectors know when a regulation has been breached. The specific conditions picked up in these proposals are the most frequent conditions seen in the complaints data and are based on data from animal welfare cases identified by MPI veterinarians in animals presented for slaughter. The codes of welfare and the general offences under the Animal Welfare Act will still cover other injuries.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that the regulation achieves the correct balance.</p>

Proposal	36. Stock transport – Animals with bleeding horns or antlers
General Comment	General support. Some sentiment that the proposal should be broader and cover 'injury' rather than single out the specific conditions in the stock transport proposals.
Common Questions	
MPI Response	<p>The regulations need to be specific in order to be clear and unambiguous so that people in charge of animals know their responsibilities and animal welfare inspectors know when a regulation has been breached. The specific conditions picked up in these proposals are the most frequent conditions seen in the complaints data. The codes of welfare and the general offences under the Animal Welfare Act will still cover other injuries.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that the regulation achieves the correct balance.</p>

Proposal	37. Stock transport – Animals with long horns or antlers
General Comment	General support. Some suggestion that horns and antler should be subject to separate regulations and have different rules (length more specific for antlers).
Common Questions	
MPI Response	MPI will consider the submissions on horns and antlers and could separate regulations if different rules are appropriate.

Proposal	38. Stock transport – Lameness cattle, deer, pigs and goats
General Comment	It was questioned why the scoring system in the lameness proposal is different to that of Dairy NZ. There was concern raised that only having a score of 0-3 for MPI's scoring system, as opposed to 1-5 leaves a lot of cases that are in between scores and hard to determine.
Common Questions	
MPI Response	MPI recognised that the proposed scale is used by MPI veterinarians at processing plants who are were trained with this scale, which was actually the same scale as DairyNZ have produced for cattle. MPI recognised that an alternative scale has been extrapolated out of the original to be applied to other species of animal. Submissions are encouraged on whether this was an appropriate scale to be using.

Proposal	39. Stock transport – Animals that cannot bear weight evenly due to injury
General Comment	It was questioned how the difference between transporting an animal that is slightly arthritic a short distance and transporting an animal with a broken leg a long distance would be dealt with?
Common Questions	<ul style="list-style-type: none"> • Is there a possibility for pursuing an offence depending on the degree of the injury? • Who is liable, the transporter or farmer?
MPI Response	<p>MPI recognised that for the transport regulations in particular the intent is to definitely leave open the possibility to prosecute under the Act for a more serious offence. Part of the clarity of the proposals is to set an upper limit for offending to be able to determine whether an offence would fall under the infringement scheme or as a prosecution under the Act. For upper level offending there will always be the opportunity to prosecute under the Act.</p> <p>The proposal leaves open the possibility of infringing the farmer and/ or the transporter, depending on the situation. As at present an MPI veterinarian/animal welfare inspector will need to make a judgement about the appropriate response and collect relevant evidence.</p>

Proposal	40. Stock transport – Pregnant animals
General Comment	Attendees wanted to know what they could do to better ensure that they are not transporting animals that are too close to their due date. It was recognised that although best efforts can be made to avoid transporting heavily pregnant animals, in some cases it may not be practical.
Common Questions	
MPI Response	MPI acknowledged that pregnant stock being transported is a very difficult regulation to develop. In robust mating and farming systems, farmers would generally know at which stage of the pregnancy the animals are. MPI encouraged submissions on this.

Proposal	41. Stock transport – Animals with injured or diseased udder
General Comment	<p>An attendee raised concern that mastitis is different in different species. One regulation covering all species may not be appropriate. A farmer transporting sheep may not know if they have mastitis or not, compared to a farmer transporting dairy cattle who would most likely know which animals have mastitis.</p> <p>It can be very difficult when loading a large number of animals (especially sheep) to notice any issues that they may have, particularly if they are not easily identifiable issues.</p>
Common Questions	<ul style="list-style-type: none"> • Where does the liability lie?
MPI Response	<p>MPI acknowledged that the difference in species is something to take into consideration. Farmers must be sure that the stock are in a fit state to transport before transporting them, and regulating this would encourage suppliers to take greater care in selecting animals. Submissions were encouraged on this.</p> <p>MPI recognised that the issue of liability is difficult to determine. Everyone must take responsibility for animals when they are being transported along a supply chain. If you are in charge of an animal at a point along the supply chain then you should be liable at that point. The regulations will be drafted to ensure clarity around who is liable.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that the regulation achieves the correct balance.</p>

Proposal	42. Stock transport – Cattle or sheep with cancer eye
General Comment	General support. Suggestion that proposed criteria fit cattle but 2cm may be too large for sheep.
Common Questions	
MPI Response	MPI acknowledged that 2cm is probably not appropriate for sheep and would consider what is appropriate in developing the regulations. MPI invited submissions to address this issue further to assist in ensuring that the regulation achieves the correct balance.

	Other Issues - Breeding
General Comment	A number of attendees were concerned about the breeding of animals. Puppy milling and the intensive breeding of other animals for the purpose of selling offspring were raised as issues that needed to be talked about.
Common Questions	<ul style="list-style-type: none"> • How many litters is considered too many litters? • Will you be looking at what age an animal should be allowed to breed?
MPI Response	NAWAC is developing a position on welfare issues related to breeding, including defects and diseases linked with breeding and production of surplus animals

Proposal	Other issues - Cats
General comment	In general there was disappointment in the lack of cat related proposals. Some attendees believed that more of the 11 minimum standards in the Cat code of welfare should be lifted in regulation.
Common questions	<ul style="list-style-type: none"> • Why aren't the minimum standards for hygiene and feeding being lifted into regulations?
MPI response	MPI stated that when looking at the minimum standards for proposals to lift into regulation, they did look specifically at the feeding of cats. However, it was seen as too complex an issue to develop a clear regulation for, as there were so many different scenarios where cats were fed. MPI made the point that the current proposed regulations are the first set to be developed under the Animal Welfare Act and are by no means an exhaustive set of regulations. In the future, NAWAC will be closely assessing other minimum standards in codes and recommending which standards should be lifted into regulation.

	NAWAC are currently working on a temporary housing code of welfare for companion animals which will have some impact on the welfare of cats, and in the future they may consider lifting some of the minimum standards into regulation.
--	---

Other Issues - Rodeos	
General Comment	Banning fireworks only in rodeos is not enough. There was a call for banning rodeos altogether, and specifically activities such as calf roping.
Common Questions	<ul style="list-style-type: none"> • Is calf roping an acceptable practice? • What about the mental state of an animal after a rodeo? • Is MPI in good faith making regulations while rodeos are in front of the Primary Production Select Committee? • What will MPI do with the footage that is being presented to them highlighting rodeo cruelty?
MPI Response	<p>In 2014, a new Rodeos code of welfare was issued. It puts in place new measures to minimise the risk of injury to animals in rodeos.</p> <p>After studying data on rodeo related injuries, NAWAC considered that there was not a high risk of injury, and did not recommend a blanket ban on rodeos. Regional authorities retain the power to ban rodeos in their areas.</p> <p>The code of welfare requires that animals must always be handled in a way that minimises the risk of pain, injury or distress. NAWAC recognised that certain events may have more potential to cause pain and suffering, such as the roping of calves. A number of minimum standards were developed to address this, which aim to reduce or prevent the risk of pain and suffering occurring.</p>

Other Issues – Horses from harness racing	
General Comment	<p>Concern was raised by a few participants about the amount of time that ex-racing horses are transported to slaughter. In some cases it was argued that horses are transported for well over 12 hours in sub-standard conditions.</p> <p>Re-homing of ex-harness horses was highlighted as an area to look into as some re-homed horses are sent to farms that cannot adequately provide for their welfare needs.</p>
Common Questions	<ul style="list-style-type: none"> • Are there any proposals to cover situations where animals are being re-homed from harness racing? • Will transport of horses for long periods of time be regulated?

MPI Response	<p>NAWAC is currently reviewing the use of animals in Exhibition, Entertainment and Encounter. The use of animals within Harness Racing currently sits within the scope of this review.</p> <p>MPI encouraged submissions on length of horse transport, which could be reviewed when making further regulations.</p>
---------------------	--

Proposal	Other issues – Livestock Shelter
General Comment	A few attendees felt strongly that production animals in paddocks should have access to shelter, and that this should become a regulation. It was argued that MPI are obliged in the Animal Welfare Act to meet the 5 freedoms of animals, and that the shelter provision is not met for livestock without shelter.
Common Questions	<ul style="list-style-type: none"> • How do you propose to address shelter for livestock?
MPI Response	Shelter is on NAWACs current work programme. NAWAC will have the ability to recommend regulations in future if deemed appropriate.

Care and Conduct Proposals – young calf proposals

Proposal	43. Young calves – Loading and unloading facilities
General Comment	Some attendees questioned why MPI were proposing to combat a behavioural problem with an infrastructural solution. Many asked why behaviour was not being targeted first.
Common Questions	<ul style="list-style-type: none"> • Why are there not regulations that stop people from throwing calves onto a truck? • Will farmers now have to spend their money on loading and unloading facilities? • Would you consider making training of calf handling a regulation?
MPI Response	<p>MPI noted that the proposed regulation on loading and unloading facilities was developed to combat the risk of rough handling of calves. Loading and unloading of calves is the most stressful part of transport, especially when there is increased handling. Requiring loading and unloading facilities will reduce the need to handle calves</p> <p>The regulation recognises that not every calf will choose to walk on to a truck, even when they physically are able to. The regulation will therefore not stop people lifting and placing calves if they need to, but seeks to minimise the amount of handling necessary.</p> <p>MPI explained that in the development of regulations a range of industry groups were consulted to look at collective actions to be taken to improve young calf welfare. The regulations are a small part of this overall package, and additional schemes such as training and education</p>

	would likely go hand in hand with the regulations. These types of additional management would likely come from within industry bodies.
--	--

Proposal	44. Young calves - Shelter
General Comment	In general, people were a bit confused about where the shelter would be required from and to.
Common Questions	<ul style="list-style-type: none"> • Will I have to shelter my calves on farm as soon as they are taken off their mother? • Will this apply to calves at saleyards?
MPI Response	This regulation was set to target the supply chain from the point of collection to the point of slaughter. This will not cover calves being transported from the back of the farm to a holding pen, or on farm transport. It will however cover calves on farm awaiting collection, saleyards, trucks and processing plants. MPI encouraged submissions on whether it should cover calves at any other point.

Proposal	45. Young calves – Fit For Transport - age
General Comment	A number of people disagreed with the proposed age for transport of young calves, and thought that 4 days was too young for transport. Some people suggested the age be increased to around 7 days of age, but others disagreed because this would put too much pressure on the shelter systems for calves.
Common Questions	<ul style="list-style-type: none"> • Why was the proposed age for calves not in line with the EU standards which hold it at 10 days?
MPI Response	<p>In New Zealand a four day old calf is generally expected to show the acceptable physical characteristics of being robust enough for transport. This proposal combined with the proposal that specifies the physical characteristics should ensure that calves are sufficiently robust to withstand transport.</p> <p>MPI noted that the EU standards are set at 10 days, however there are different historical and economic drivers that have led to this. Changing from four days to a later date would be a significant change for farmers who would have to more than double their calf facilities and management. MPI would require strong evidence that transport at 10 days old is significantly better for calf welfare than transport at four days old. Currently that evidence is not available. Both four days and ten days are based on what is customary in each country. The available welfare science does not suggest that calf welfare is better in one system than the other.</p>

	<p>The proposal is stronger than the minimum standard as it requires calves to be four full days of age.</p> <p>MPI encouraged submissions and suggestions on the time a calf should be fed prior to transport.</p>
--	---

Proposal	46. Young calves – Fit For Transport – Physical Characteristics
General Comment	A number of attendees were confused about who the onus would be on to ensure that calves are fit for transport?
Common Questions	<ul style="list-style-type: none"> Who will be liable for transporting calves that are not fit for transport?
MPI Response	<p>MPI explained that there will be joint liability for ensuring calves are fit for transport. The farmer must ensure that the calves presented for transport are fit and the transporter must ensure that the calves loaded are fit for transport.</p> <p>The proposal leaves open the possibility of infringing the farmer and/or the transporter, depending on the situation. As at present an animal welfare inspector will need to make a judgement about the appropriate response and collect relevant evidence.</p>

Proposal	47. Young calves – Maximum time off feed
General Comment	<p>A number of attendees at consultations criticised that 24 hours was too long for a calf to spend off food.</p> <p>In response to taking away the 2 hour feed before transport limit that is currently in Minimum Standards, a number of farmers asked whether this could be increased to 4 hours to make it more workable but still provide a guide for when to feed.</p>
Common Questions	<ul style="list-style-type: none"> Why is the time limit set at 24 hours?
MPI Response	<p>MPI looked extensively at the available science surrounding time off food for bobby calves. The current minimum standard holds this to be 30 hours, however research suggests that 24 hours off food as a maximum time is best practice. Blood glucose has been shown to steadily decline from about 18-24 hours off feed, so 24 hours has been set as the upper limit for this.</p> <p>MPI encouraged submissions and suggestions on the time a calf should be fed prior to transport.</p>

Proposal	48. Young calves – Duration of transport
General Comment	<p>Concern was raised by some attendees that limiting the transport time to 8 hours would exclude some farms from being able to transport their calves as they are very far from a processing plant. In particular, in the peak of the season when some processing plants may be full to capacity and in the shoulder seasons where some plants may not be operating this could be an issue.</p> <p>A number of attendees argued that there should be a requirement in the regulations that calves be transported to the nearest processing works to the farm of origin.</p>
Common Questions	<ul style="list-style-type: none"> • Will this cover calves going to other farms for rearing?
MPI Response	<p>In some cases a processing plant may not be able to take the calves on, which leads them to be transported to other processing facilities. This is something MPI needs to look into when further developing these regulations.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that the regulation achieves the correct balance.</p>

Proposal	49. Young Calves – Blunt force trauma
General Comment	General support as long as emergency exceptions are retained.
Common Questions	
MPI Response	MPI has asked questions about whether the emergency exception should be retained in the discussion document. We will consider the responses to these questions in the submissions we receive.

Proposal	50. Young Calves – Transport by sea across Cook Strait prohibited
General Comment	General support.
Common Questions	<ul style="list-style-type: none"> • How often are calves transported across the Cook Strait?
MPI Response	To the best of MPI's knowledge young calves have not been transported across the Cook Strait for some years, but this proposal will ensure that the practice does not re-commence.

Surgical and Painful Procedure Proposals

Proposal	51. All animals – Hot branding
General Comment	Was not raised in public meetings.
Common Questions	
MPI Response	

Proposal	52. All animals – Embryo collection via exteriorised uterus (surgical embryo transfer)
General comment	Some attendees expressed some concerns over such a significant procedure being performed by ‘any person’.
Common questions	<ul style="list-style-type: none"> • Did MPI consider having some sort of process where people could be authorised to do this procedure, instead of allowing the procedure to be performed by ‘any person’?
MPI response	<p>MPI acknowledged that they had considered the needs for some type of ‘accreditation process’ for some of the procedures when looking at the proposals as there are a number of surgical and painful procedures that currently have skilled non-vet technicians undertaking the procedure. MPI acknowledged that further work needs to be undertaken to understand if it is necessary or feasible to develop some type of approval / accreditation process for operators undertaking these procedures.</p> <p>The fact that pain relief is required for this procedure means that there will be some level of vet oversight, as the vet will need to prescribe the pain relief for the procedure. At this point the vet can set any requirements for its use.</p> <p>(See notes under “General: Pain relief regime” for an explanation on accessing pain relief).</p>

Proposal	53. All animals – Laparoscopic artificial insemination (Artificial A.I.)
General comment	Some attendees expressed some concerns over such a significant procedure being performed by ‘any person’.
Common questions	<ul style="list-style-type: none"> • Did MPI consider having some sort of process where people could be authorised to do this procedure, instead of allowing the procedure to be performed by any person?
MPI response	<p>MPI acknowledged that they had considered the needs for some type of ‘accreditation process’ for some of the procedures when looking at the proposals as there are a number of surgical and painful proposals that currently have skilled non-vet technicians undertaking the procedure. MPI acknowledged that further work needs to be undertaken to understand if it is necessary or feasible to develop some type of approval / accreditation process for operators undertaking these procedures.</p>

	<p>The fact that pain relief is required for this procedure means that there will be some level of vet oversight, as the vet will need to prescribe the pain relief for the procedure. At this point the vet can set any requirements for its use.</p> <p>(See notes under “General: Pain relief regime” for an explanation on accessing pain relief).</p>
--	---

Proposal	54. All animals – Liver biopsy
General comment	There was support from some attendees for limiting this procedure to vet or vet students only.
Common questions	
MPI response	

Proposal	55. All animals – Dental work
General comment	Some attendees thought that this proposal was unclear. It was not clear who it applied to (“seems to exclude lay dentists, should this be any person or a vet)
Common questions	<ul style="list-style-type: none"> • Does this proposal apply to lay dentists or is it applicable to any person?
MPI response	This proposal relates to any person using a power tool. This proposal needs to be read in conjunction with the new criteria for determining what a significant surgical procedure is. The new criteria will be brought into effect with the regulations. Under the Act only vets can undertake significant surgical procedures. The new criteria determines what is a significant surgical procedure in the context of dentistry i.e. a surgical or operative procedure below the surface of the teeth or below the gingival margin.

Proposal	56. Cats - declawing
General comment	Some attendees highlighted that in the proposals there is a restriction on de-clawing unless done in the best interest of the animal, which raised the question about whether performing such a surgical procedure would ever be in the interest of the animal. It was recognised that certain countries had outright banned the practice.
Common questions	<ul style="list-style-type: none"> • Why are you regulating cat declawing? • What does ‘in the best interests of the animal’ mean
MPI response	The proposed regulation is to restrict declawing unless for therapeutic reasons for the animal.

	<p>MPI explained that the proposal reflects the current restriction in the Animal Welfare Act related to declawing, which will be revoked when the regulations come into force (as part of process to streamline the regime within the Animal Welfare Act). If the proposed regulation goes forward, it will be at a vet's discretion whether this procedure would be in the best interest of the animal, which could be due to injury or disease. Alternatives to de-clawing could include re-homing or providing stimulation to cats.</p>
--	---

Proposal	57. Companion animals – Desexing (incl. stray / feral cats, dogs and other species)
General comment	Some attendees confirmed support for this proposal.
Common questions	
MPI response	

Proposal	58. Dogs – Freeze branding
General comment	No specific questions were raised on this issue.
Common questions	
MPI response	

Proposal	59. Dogs – Dog debarking (and devoicing of other species)
General comment	Some attendees highlighted that in the proposals there is a restriction on de-barking unless done in the best interest of the animal, which raised the question about whether performing such a surgical procedure would ever be in the interest of the animal. It was recognised that certain countries had outright banned the practice.
Common questions	<ul style="list-style-type: none"> • A dog can still mimic barking so how is this restricting its ability to express natural behaviours?
MPI response	<p>The proposed regulation is to restrict debarking unless for therapeutic reasons for the animal.</p> <p>MPI explained that the proposal reflects the current restriction in the Animal Welfare Act related to debarking, which will be revoked when the regulations come into force (as part of process to streamline the regime within the Animal Welfare Act). If the proposed regulation goes forward, it will be at a vet’s discretion whether this procedure would be in the best interest of the animal. Alternatives to debarking could include behavioural training, providing additional stimulation or re-homing.</p>

Proposal	60. Dogs – Cropping the ears
General comment	Some attendees thought that NZ does not have a problem with cropping dogs' ears. It was argued that the cropped dogs you do see are imported for breeding, and they are not allowed at shows.
Common questions	<ul style="list-style-type: none"> • Why prohibit something that is not an issue?
MPI response	MPI explained that the proposal reflects the current offence provisions in the Animal Welfare Act related to cropping the ears of a dog. These provisions will be revoked when the regulations come into force (as part of process to streamline the regime within the Animal Welfare Act). The regulations will make it clear that cropping a dog's ear, to make them stand upright, will still be an offence.

Proposal	61. Dogs – Dew claws
General comment	<p>The proposal relating to regulating dew claw removal was a contentious area of discussion at the public meetings.</p> <p>It was argued that banning dew claw removal would lead to worse welfare outcomes for dogs based on the high injury incidence. There was contention between attendees about whether puppies feel the pain of the removal of dew claws at such a young age regardless of whether or not they are articulated. Advocates for dew claw removal claimed the low rate of dew claw injury currently seen by vets can be attributed to the fact that susceptible breeds routinely have them removed.</p> <p>It was also argued that removing a puppy from its mother to take it to a vet when it is very young is crueller than removing the dew claws quickly at home.</p> <p>Advocates for dew claw removal wanted to make it clear that they choose to remove dew claws because they care about the animal's welfare.</p> <p>Advocates for dew claw removal also suggested that an accreditation programme, similar to the dog tail banding scheme, could be developed for dew claw removal.</p> <p>Vets who attended the meetings were supportive of the prohibition and confirmed that they had seen infections in dew claws that have been removed from puppies.</p>
Common questions	<ul style="list-style-type: none"> • Why is MPI banning a procedure that benefits an animal's welfare? • What codes of welfares or international legislation did MPI look at in coming up with this proposal? • How will MPI monitor non-compliance?

MPI response	<p>MPI clarified that the rationale for the proposal was that articulated dew claw removal often required cutting through the bone and that can result in pain and infection.</p> <p>In developing this proposal, MPI used the expertise of a joint working group⁷ that reviewed existing minimum standards relating to the removal of dew claws, who recommended lifting the procedure into regulation.</p> <p>In relation to removing a pup from its mother, MPI noted that this is a scenario that would rarely happen as under this proposal articulated dew claws can only be removed for therapeutic reasons. MPI is not proposing to regulate the removal of unarticulated dew claws on hind limbs under the age of 4 days, so this can still feasibly happen.</p> <p>For monitoring compliance with this regulation, MPI stated it would work closely with official bodies including breeding associations, on an assumption that the bodies would want to comply. In the first instance, MPI would be working with them on an educational basis to ensure people were well informed of their responsibilities.</p> <p>MPI encouraged submissions on this issue. All feedback will be taken into account by MPI and used to inform the rest of the regulation development process.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that any regulation, if made, achieves the correct balance.</p>
--------------	--

Proposal	62. Dogs – tail docking
General comment	<p>Tail docking of dogs was an area that many attendees felt strongly about.</p> <p>It was argued that a lot of time and money had gone to developing a robust training and auditing process for accredited people to be able to safely band tails. Advocates for tail docking argued that the limited incidence of tail injuries can be attributed to the fact that most susceptible breeds currently have their tails docked.</p> <p>It was argued that banning tail docking would lead to worse welfare outcomes for dogs based on the high injury incidence. Dog owners said that docking tails prevented animal welfare issues in breeds that are susceptible to issues with their tails. There was contention between attendees whether puppies feel the pain of tail docking at such a young age.</p> <p>The point was made that prohibiting tail docking could be counter-productive and have worse outcomes, as breeders could start using bob-tail animals to breed which could cause issues with the spine in offspring.</p> <p>It was also contested by attendees that the study MPI referenced for rationalisation of this proposal was a short one and did not provide an accurate picture of the benefits of docking.</p>

⁷ The joint working group consisted of representatives from NAWAC, MPI, RNZSPCA and the Veterinary Council of New Zealand.

	<p>It was also suggested that this regulation should be breed specific to those dogs that need their tails, but should allow safe and professional removal of tails from dogs that have historically had their tails docked.</p> <p>Advocates for dog tail docking wanted to make it clear that they choose to dock because they care about the animal's welfare.</p> <p>Vets who attended the meetings were supportive of the prohibition and many stated that they hardly ever saw tail injuries serious enough to warrant docking.</p>
Common questions	<ul style="list-style-type: none"> • Why does dog tail-docking have to be done by the vet when lamb under the age of 6 months can be docked by anyone? • Why is MPI changing its mind when a lot of time and money has gone into developing a robust training and auditing process for accredited banders. • If this regulation goes through, how will MPI enforce it?
MPI response	<p>MPI noted that tail docking had been the subject of much contention throughout the consultation process. MPI explained that the rationale behind the proposal was that tails on dogs have a purpose and that it is therefore unnecessary to remove them other than to respond to disease or injury. In contrast, the docking of a lamb's tail has a benefit to the individual animal and reduces the risk of fly strike.</p> <p>In developing the proposals, MPI used the expertise of a joint working group⁸ that reviewed existing minimum standards within the codes of welfare and whether changes to existing requirements were appropriate. For dog tail docking, it was considered that tails have a function in terms of communication and balance. In addition, recent research in both New Zealand and Scotland indicated that tail docking did not prevent tail injuries.</p> <p>In relation to suggestions that this could encourage breeding of unhealthy animals, MPI noted that NAWAC has a work stream looking at breeding related welfare issues.</p> <p>For monitoring compliance with this regulation, MPI stated it would work closely with official bodies including breeding associations, on an assumption that the bodies would want to comply. In the first instance, MPI would be working with them on an educational basis to ensure people were well informed of their responsibilities.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that any regulation, if made, achieves the correct balance.</p>

⁸ The joint working group consisted of representatives from NAWAC, MPI, RNZSPCA and the Veterinary Council of New Zealand.

Proposal	63. Cattle – Teats
General comment	<p>Some attendees were concerned about the timeframe given for teat removal. Attendees thought that the age should be raised to 12 weeks as sometimes the supernumerary teat is not big enough at 6 weeks old. This is also a procedure that is often performed at the same time as disbudding at 12 weeks old.</p> <p>There was also support from some attendees that a main teat must always be removed by a vet.</p>
Common questions	<ul style="list-style-type: none"> • Where did MPI get the 6 week rule from?
MPI response	<p>Research shows that the removal of a supernumerary teat on a calf under 6 weeks of age is much less painful than when they are older. As the teat gets larger it develops more tissue and may require wound closure.</p> <p>MPI encouraged submissions supported by science for teat removal at 12 weeks of age. All feedback will be taken into account by MPI and used to inform the development of this proposal.</p>

Proposal	64. Cattle – Claw removal
General comment	No specific questions were raised on this issue.
Common questions	
MPI response	

Proposal	65. Cattle – Teat occlusion
General comment	No specific questions were raised on this issue.
Common questions	
MPI response	

Proposal	66. Cattle – Tail docking
General comment	Some attendees considered that cattle tail docking was still needed for hygiene reasons and prevention of leptospirosis, and were concerned with how the regulation would be enforced.
Common questions	<ul style="list-style-type: none"> • Why is tail docking for cattle is being prohibited completely? • What about calves (or sheep) that have their tails eaten off by their mothers? Or situations where tails fall off because of other reasons?

MPI response	<p>MPI clarified that cattle tail docking and/or shortening will still be allowed for therapeutic reasons to respond to disease or injury. MPI understood that there is growing support for prohibiting cattle tail docking and that DairyNZ has also been working with farmers to introduce an industry ban on tail docking.</p> <p>The view is that there are reasonable alternatives to docking tails, such as trimming the switch and that a vaccine has been developed to address leptospirosis. To prevent leptospirosis in farm workers requires the implementation of a leptospirosis management and prevention programme as part of the overall animal health programme. Docking a cow's tail will likely not stop urine splash.</p> <p>In addressing the issues with calves that have lost their tails due to other reasons, MPI noted the issue causing loss of tail would generally affect a whole herd, not just individuals, so it shouldn't be difficult for an inspector to identify what the cause of the tail loss is.</p>
--------------	--

Proposal	67. Cattle and sheep – Castration and shortening of the scrotum (Cryptorchid)
General comment	<p>Some attendees felt that allowing castration of cattle and sheep up to 6 months with a rubber ring was far too late to be performing this procedure. The regulation should reflect that it is best practice to castrate at the earliest point possible for the animal.</p> <p>Some attendees also thought that pain relief should be given for the rubber rings as it is a slow and painful process.</p> <p>Attendees wanted MPI to take note of the fact that in some situations the age restriction or blanket ban on surgical castration would be impractical, and wanted confirmation from the panel that these regulations would be applied sensibly.</p>
Common questions	<ul style="list-style-type: none"> • When creating the wording for this regulation did MPI consider putting a weight limit there? Sometimes calves that are less than 6 months old are still too big to be castrated by rubber rings. • Were other methods of castration (i.e. the burdizzo) considered?
MPI response	<p>MPI noted that the age restriction of 6 months came directly from the code of welfare, which was created in 2005. MPI stated it would be very interested in hearing from farmers about what would be the best weight and/or age to include in regulation, and whether it should be a combination of both weight and age.</p> <p>MPI confirmed that other options were looked into for castration, and it was decided that under the age of 6 months the only acceptable method would be the rubber rings if not done by vet or vet student.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that the regulation achieves the correct balance.</p>

Proposal	68. Cattle, sheep, & goats - Disbudding
General comment	There were differing opinions from attendees as to whether disbudding was painful and therefore whether pain relief was necessary. Attendees questioned the practicality of administering pain relief for disbudding.
Common questions	<ul style="list-style-type: none"> • Why is pain relief for disbudding necessary – it is not painful? • How can farmers access pain relief?
MPI response	<p>The research that supported the development of the painful husbandry procedure code of welfare (which currently sets out of the standards for disbudding) showed disbudding to be painful.</p> <p>MPI stated that the current disbudding practice outlined in the painful husbandry procedure code of welfare doesn't require pain relief. As pain relief is more widely available, and as this is a painful procedure, MPI believed it was appropriate to consider requiring pain relief for this procedure as part of these proposals.</p> <p>There are already drugs available to be used for disbudding, and MPI believes farmers are already used to using restricted vet medicines for other procedures. MPI does, however, recognise that there will be logistical challenges, so suggested that concerned attendees submit on an acceptable transition period.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that the regulation achieves the correct balance.</p> <p>(See notes under “General: Pain relief regime” for an explanation on accessing pain relief).</p>

Proposal	69. Cattle, sheep, & goats - Dehorning
General comment	Attendees thought that requiring pain relief in a real-life situation was unworkable. If a farmer has their animals in the yard and noticed horns that need removing, it is impractical to have to go back and retrieve pain relief.
Common questions	<ul style="list-style-type: none"> • Why have you modified dehorning to require pain relief? • Why have you lumped three different species together, but have separated requirements out for other procedures, e.g. tail docking.
MPI response	<p>MPI stated that the current dehorning practice outlined in the painful husbandry procedure code of welfare doesn't require pain relief until an animal is 9 months old. As pain relief is more widely available, and as this is a painful procedure, MPI believed it was appropriate to consider requiring pain relief for this procedure as part of these proposals.</p> <p>There are already drugs available for use for dehorning, and MPI believes farmers are already used to using restricted vet medicines for other procedures. MPI does, however, recognise that there will be logistical challenges, so suggested that concerned attendees submit on an acceptable transition period.</p>

	<p>In relation to the joint proposal, MPI’s understanding was that people also dehorn goats and sheep as well as cattle by a similar method. It is a painful procedure for all three species and the reasons for dehorning are all the same – i.e. to reduce the significant risk that horned animals posed to the health and welfare of other animals, themselves (for ingrown horns) and humans.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that the regulation achieves the correct balance.</p>
--	---

Proposal	70. Sheep – Tail docking
General comment	<p>Some attendees felt that allowing the docking of sheep tails up to 6 months with rubber rings was far too late to be performing this procedure. The regulation should reflect that it is best practice to dock tails at the earliest point possible for the animal.</p> <p>There was disagreement amongst the attendees about what the acceptable length of tail should be. While most agreed that a tail shouldn’t be cut flush, it was also argued that ‘covering the vulva and similar length in males’ was too long and risked dags.</p>
Common questions	<ul style="list-style-type: none"> • Why isn’t pain relief required? • Why can a lamb’s tail be docked by ‘anyone’? • Have MPI looked into using a knife for tail docking of animals under 6 months? It is more realistic for large herds and relatively blood free. • What should the acceptable length of the tail be?
MPI response	<p>The practice of docking lambs is widespread, and requiring pain relief for this practice is impractical at this point in time.</p> <p>Due to the nature of the procedure, the proposal allows ‘anyone’ to perform the procedure under 6 months of age as there are many non-vets who are experts at this procedure and can do it just as efficiently and effectively as a vet. This wording was chosen to allow these people to continue to do the procedure after the new rules in the Act come into force.</p> <p>In relation to the use of knives for docking, MPI noted that they have looked at the costs and benefits of different techniques across different species and the painful husbandry procedure code of welfare identifies removal by knife as more painful than the proposed methods. MPI encouraged submissions with information about the prevalence of tail docking using other methods.</p> <p>MPI explained that it was difficult to define a specified tail length, but the proposal had been written so that the tail must not be cut flush. MPI noted that the discussion document specifically sought feedback on what would be considered an appropriate length and how that could be described. MPI encouraged feedback on a workable standard for how long the tail should be docked to.</p>
Proposal	71. Sheep - Mulesing

General comment	No specific questions were raised on this issue.
Common questions	
MPI response	

Proposal	72. Deer - develvetting
General comment	<p>There was concern from attendees that a lay person who has accreditation from DINZ would be much better equipped to perform the procedure than most vets. Vets need to have relevant experience and knowledge.</p> <p>Some attendees also queried whether the use of analgesic rings would constitute pain relief at the time of the procedure.</p>
Common questions	<ul style="list-style-type: none"> • Why are MPI replacing the current accreditation system if it is working well? • What would constitute pain relief for develvetting?
MPI response	<p>MPI noted that currently develvetting is a controlled procedure under the Act. However, once the new significant surgical procedures criteria in the Act come into force there will be no specific restrictions on develvetting.</p> <p>This proposal is intended to provide clarity that this is a significant procedure and that controls around how this procedure is performed are still required.</p> <p>The proposal aligns with the DINZ’s develvetting programme that requires that people accredited to perform develvetting are under a programme administered and approved by veterinarians under the National Velvetting Standards Body (NVSBS) programme.</p> <p>MPI also noted that as currently worded the use of analgesic rings would not fit within the proposed definition of pain relief but that it would work with industry to resolve this issue.</p> <p>Note: At the industry specific meetings, MPI discussed with industry the potential implications of the proposed definition of pain relief on the use of analgesic rings and asked them to provide specific comment on this issue as part of their formal submission.</p>

Proposal	73. Horses – Blistering, firing or nicking
General comment	No specific comments were made during the public meetings.
Common questions	
MPI response	NB: MPI sought specific comment on this proposal from the horse sector during the consultation period.
Proposal	74. Horses – Tail docking

General comment	No specific comments were made during the public meetings.
Common questions	
MPI response	NB: MPI sought specific comment on this proposal from the horse sector during the consultation period.

Proposal	75. Horses – Rectal pregnancy diagnosis of horses
General comment	No specific comments were made during the public meetings.
Common questions	
MPI response	NB: MPI sought specific comment on this proposal from the horse sector during the consultation period.

Proposal	76. Rectal examination of horses
General comment	No specific comments were made during the public meetings.
Common questions	
MPI response	NB: MPI sought specific comment on this proposal from the horse sector during the consultation period.

Proposal	77. Horses – Caslick’s procedure
General comment	No specific comments were made during the public meetings.
Common questions	
MPI response	NB: MPI sought specific comment on this proposal from the horse sector during the consultation period.

Proposal	78. Horses - Castration
General comment	No specific comments were made during the public meetings.
Common questions	
MPI response	NB: MPI sought specific comment on this proposal from the horse sector during the consultation period.

Proposal	79. Llama and alpaca – Castration
General comment	Some attendees were concerned about the older age limits for castration of camelids, and how it would affect the sale or rehoming of animals.
Common questions	<ul style="list-style-type: none"> • How did MPI come up with the age limit of 8 months for alpaca and 15 months for llama?
MPI response	<p>MPI noted that the ages came out of current codes of welfare, and are based on scientific research that shows that early castration may affect a camelid's skeletal and muscle development.</p> <p>Llama and alpaca have different rates of growth, which is why there is a difference in age for castration.</p> <p>MPI encouraged attendees to give information or evidence for the use of different ages they may have in submissions.</p>

Proposal	80. Pigs - Castration
General comment	No specific comments were made during the public meetings.
Common questions	
MPI response	NB: MPI sought specific comment on this proposal at industry specific meetings during the consultation period.

Proposal	81. Pigs – tail docking
General comment	The question was raised as to why tail docking a piglet was allowed to be performed by a lay person.
Common questions	<ul style="list-style-type: none"> • Why can a pig under the age of 7 days have its tail docked by any lay person?
MPI response	<p>MPI explained that the rationale behind this is that docking the tail early on prevents injury through tail-biting.</p> <p>Tail biting is a multi-factorial issue and at the current time there is not one solution to fix all incidences. The removal of a pig's tail by a lay person is considered one practical means by which to reduce the incidence of tail docking. In the Pig Code of Welfare NAWAC recommends that other measures to control tail biting should be considered before tail docking is undertaken'</p> <p>When the new criteria for what is a significant surgical procedure come into effect, this regulation will be needed to ensure that those people who currently undertake this procedure and are expert at it (but are not vets) are able to continue doing so.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that the regulation achieves the correct balance.</p>

Proposal	82. Birds – Pinioning or otherwise deflighting a bird
General comment	No specific questions were raised on this issue.
Common questions	
MPI response	

Proposal	83. Poultry - Dubbing
General comment	No specific questions were raised on this issue.
Common questions	
MPI response	

Proposal	84. Ostriches and Emus - Declawing
General comment	No specific questions were raised on this issue.
Common questions	
MPI response	

Proposal	85. Roosters – Caponising (rooster castration)
General comment	No specific questions were raised on this issue.
Common questions	
MPI response	

Proposal	Other Issues: Tail docking
General comment	Attendees who were concerned with the prohibition of tail docking often raised the difference between the rules for lambs and dogs.
Common questions	<ul style="list-style-type: none"> • Why are there different standards for the docking of different animals tails? • Why is fly strike in sheep or tail biting in pigs considered to be worse than split tails in dogs?
MPI response	MPI is proposing regulations relating to tail docking for five different animal species. It is proposing outright prohibitions (except for therapeutic reasons) for dogs, cattle, and horses, while it is restricting the circumstances for docking for lambs and pigs. The different approaches relate to whether there are benefits to the animals of removing its tail and / or whether alternatives exist. Studies have shown that horses and cattle use their tails to manage flies, while dogs use their tails to communicate. MPI recognises that for pigs and sheep there is a balance between the benefits that tail

	<p>docking provides, and the pain of the procedure. Docking sheep reduces problems with fly strike, and docking pigs reduces issues with tail biting.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that any regulations made, if any, achieve the correct balance.</p>
--	--

Proposal	General: Pain relief regime
General comment	Attendees were interested in how the new regime relating to pain relief was going to work. Some had questions about who could ultimately use the pain relief and perform the procedure (only those who purchased it, a farm hand etc.), and others had queries about how the relationship between vet and farmer would be managed.
Common questions	<ul style="list-style-type: none"> • What will be considered ‘pain relief’? • How will pain relief be regulated? • Will there be a national training programme for the use of pain relief, or will it be decided on a personal level by the vet on how much training they will give?
MPI response	<p>The proposed definition for pain relief, as outlined in the discussion document, is: <i>Throughout the performance of the surgical procedure, an animal must be under the influence of a general or local anaesthetic that is sufficient to prevent the animal from feeling pain.</i></p> <p>This definition limits ‘pain relief’ to anaesthetics, and excludes homeopathic medicines. While the regulation for pain relief is limited to anaesthetics, it is important that the use of analgesics also be considered for post-procedure pain. The need for analgesics will remain part of the best practice section of codes of welfare for now.</p> <p>MPI explained that in most cases the pain relief will be a restricted vet medicine and as such its use must be authorised by a vet. However, a vet can authorise a non-vet to use the pain relief without a vet needing to be present. One way to provide this authorisation is through Veterinary Operating Instructions (VOI). A VOI is where a vet provides instructions to the non-vet about how to use, store etc. the pain relief.</p> <p>MPI has previously established guidelines for vets that describe how they can authorise a non-vet to hold and use restricted veterinary medicines. Farmers, operators and vets will need to work together to ensure that those administering the pain relief have sufficient knowledge and competence to use these medicines.</p> <p>It is for this reason that delaying the implementation of some of the surgical and painful regulations may be necessary to enable systems changes to occur before new standards become mandatory.</p> <p>MPI invited submissions to address this issue further to assist in ensuring that any regulations made achieve the correct balance.</p>

Live Animal Exports Proposals

Proposal	General: Live Animal Exports
General Comment	Concern was raised about the Saudi Arabia exports, and that MPI would not know what kind of welfare the animals would have when they arrived at their destination.
Common Questions	<ul style="list-style-type: none">• Are there going to be regulations that mean we won't be exporting to countries who don't have established animal welfare?• Is there a procedure to log numbers of dead animals during a trip?
MPI Response	<p>Proposed regulations relating to live animal exports will bring into effect provisions in the Animal Welfare Amendment Act 2015 that will enable the Director-General of the Ministry for Primary Industries to require exporters to report on the welfare of exported animals during their journey and for up to 30 days post-arrival.</p> <p>The information provided in reports will be used to inform guidance on the export of live animals and subsequent approvals to export.</p>

Appendix E: List of groups and individuals who provided submissions during consultation

Organisations and Associations

New Zealand Rodeo Cowboys Association	Dairy Companies Association of New Zealand	New Zealand Rock Lobster Industry Council
New Zealand Council of Docked Breeds	The New Zealand Animal Law Association	New Zealand Companion Animal Council Inc.
Ultra-Scan Ltd	Helping you Help Animals (HUHA) Charitable Trust	Poultry Industry Association of New Zealand
New Zealand Animal Law Association	DairyNZ	The Weimaraner Club Inc.
National Animal Welfare Advisory Committee	Federated Farmers	Tasman Districts Gundog Society
Farmwatch	Fonterra	New Zealand Council of Docked Breeds
Meat Industry Association	Beef+Lamb NZ	Chained Dog Awareness NZ
The New Zealand Kennel Club	Save Animals From Exploitation (SAFE)	Griffon Bruxellois Club
Direct Animal Action	World Animal Protection New Zealand	The Working Spaniel Club
Soil & Health Association	Compassion in World Farming	Advocate of Purebred Dog Breeders
New Zealand Veterinary Association - Dairy Cattle Veterinarians	National Dog Groomers Association of NZ	New Zealand Llama Association
New Zealand Veterinary Association – Sheep and Beef Cattle Veterinarians	South Island Poodle Club	Central Welsh Corgi League Inc.
New Zealand Veterinary Association – Equine Veterinary Association	Anti Rodeo Action NZ	NZ Gundog Trial Association
New Zealand Veterinary Association - Food Safety, Animal Welfare and Biosecurity Branch	The Honeybee Society of NZ Incorporated	South Auckland Gun Dog Club
The Royal New Zealand Society for the Prevention of Cruelty to Animals (RNZSPCA)	New Zealand Pork	Greyhound Racing New Zealand
	The Continental Gundog Club	Ladies Kennel Association Inc.
	NZ Horse Network	New Zealand Thoroughbred Racing
	Deer Industry New Zealand	Versatile Hunting Dog Test Association (NZ)
	Brownrigg Agriculture	

Lonely Miaow Association
Inc.

Dogsport New Zealand Inc.

Waikato Gundog Club

Kiwi Sport-Hunde Club

Auckland Pug Dog Club Inc.

South Island Boxer Club Inc.

The Brittany Club in New
Zealand

Association of Pet Dog
Trainers New Zealand

NZ Gundog Trial Association
(NZGTA)

National Dog Groomers
Association of New Zealand

Veterinary Council of New
Zealand

Canterbury Combined
Terrier Club Inc.

Rural Women New Zealand

New Zealand Vegan Society

Palmerston North Vegan
Society

Individuals

Katie Saunders	Sophie Sills	Bianka Atlas
Paul Hellings	Barbara Stronach	Sam Vrij
Karen McMorran	John Grant- Mackie	Maree Martinussen
Luca Biuso	Ashley Stewart	Barbara Marlena Simon
Bijoux Miller	Nicola Kriek	Bev Harris
Samantha Fairley	Terri Newton	Martin Webb
Rita Grenyer	Laura Gentle	Rebecca Arnold
Philip Armstrong	Alice Fairley	Annie Potts
Pamela Nunn	Rosie Smyth	Anna Carr
Leigh Donohue	Catherine Robinson	Vegan Yogini
Coralee Jones	Jennifer Gilbert-Potts	Sarah Macauley
Robyn Edwards	Taylor Pascoe	Geraint Scott
Alexandra Simpson	Kayla Alexander	Aimee Gestro
Becky Turrell	Thea Lyle	Steve and Sarah Page
Kirstie Stevens	Warwick Lissaman	Susan Durcan
Lisa Couling	Mindy Pilbrow	Apollo Taito
Matt Hanson	Lucy Goldbro	Joe Zalucki
Marian Baxter	Brian Brogan	Tina Herjrskov
Juanita Doherty	Lisa Hart	Amy Ardern
Shannon Grant-Mackie	Yolanda Soryl	Rhiannon McGrane
Georgia Olsen	Briar Tiffen	Vanessa Fyfe-Wood
Stuart & Susan Henderson	Lyndsay Veganforlife	Issy Power
Leah Lynch	Jenny Spark	Kath Dewar
Nikki Adams	Emily Rodgers	Dorothy Maiden
Sean O'Connor	Rebecca Coldicutt	Richard Geismar
Jean Allan	Amber Burgess	Rachel Herriott
Melissa Wood	Katrina Osgood	Jake Eames
Amalie Niland	Victoria Koch	Allie Howard
Melisa Quinn	Eva Nagel	Michelle Keenan

Margaret Hardwick-Smith	Simon McDouall	Jon Terry
Marie Crawford	Rishi Adiga	Romina Marinkovich
Romina Marinkovich	William Worsfold	Bridget Bucknell
Anna van den Bosch	Deirdre Sims	Aisha Hill
Susi Peterson	Jean Lyle	Joanne Rusbach
Nadine Williams	Meg Wilks	Denise Ryan
Tiffany Olsen	Jenny Abraham	Shelley Williams
Julie Inglis	Anna de Valk	S Angrove
Susan Elias	Chris Harkess	Delores Van Niekerk
Tracey Winiata	Ali Simpson	Gordana Sokorac
Lotte Maxwell Bayly	Laura Twomey	Dharini Marinkovich
Nathalie Sperling	Lisa Noonan	Penny J Wright
Ruthie van Dyke	Lindy Herrick	Aleesha Clark
Ria van Dyke	Kathleen Lafferty	Kat Ferris
Andrew Solley	Catherine Woeber	Mark Craig
Liz Atkinson	Catriona MacLennan	Tiffany Olsen
Suzanne Beer	Joanne Williams	Kristen Fraser
Michelle Androu	Lisa McEwan	Lynley Olsen
Annie Whiteside	Jane Riley	Rebecca Hickson
Robert Picciotto	Michelle Davenport	Diana Beswetherick
Kath Worsfold	Rhonda Findlay	Julie James
Sharon Arnerich	Sara Sutherland	Luis Thacker
Sue Kurokawa	Karen McDonnell	Lynley Tulloch
Louise O'Callaghan	JA & JM Leigh	Murray Thacker
Anne Robson	Michael Morris	Lynda Griggs
Laura Bary	Stuart Davison	Elke and Philip Thompson
Alan Thatcher	Kevin Brown	Catherine Sinclair
Trevor Simpson	Billy Leonard	Lyndell Olley
Wendy Cuife	Majorie Orr	Nicki Robinson
Marta Vivancos	Shelli Mears	Christine Rotzel
Sandy Jackson	Ian Hodge	Amie Wolken

Roz Holland	Matthew Deighton and Chris Stewart	Kathleen Andrews
Virginia Woolf	Sacha Berger	Nancy Pelletier
Dominique Mallard	Claire Brooks	Brent Muir
Samantha Penman	Scott Sandford	Fiona Ireland
Sara Clews	Karen Budden	Julia Stewart
Paul Corboy	Lisa Larsen	Bronwyn Falconer
Carolyn Walker	Janet Wade	Colin Dew
Gail Blankley	Lawrence Hill	Carolyn Harkess
Bailey Ingham	S.A. Judd	Atholl B Blackmore JP
Deborah Robinson	Vivien Dostine	R T Blackmore
Brian Currey	Neil Christensen	Des Kehoe
William Sandle	Wendy Jane O'Callaghan	Clare Browne
Raymond Artist	David Brownrigg	Cathy Duder
Cindy Case	Fiona Scott	Deborah Addenbrooke
Steven Rondel	Murray and Bronwyn Braven	Sandra Kyle
Anneline Thorpe	Sarah Asher	Lindy Dawkins
Sam Stocker	Kaye Lord	Danna Glendining
Mark Shakeshaft	Matthew J Quested	Stephanie Laing-Smith
Helen McCabe	Alison Kollenberg	Jennifer Blankley
Simon Roberts	Neil & Kathryn Debenham	Wiki Te Tau
Paula McGregor	Maurice Olner	Shaun Ireland
Paul Grant	Claire McBride	Karen McIntyre
Mark Simpson	Richard Tyson	Gail and Nick Goodwin- Smith
Sarah Oliver	Janet Ritchie	John Gillanders
Catherine Napp	Megan Chalecki	Mike Athy
Grace McLean	Maurice Olner	Cath Smith
Ros Mihaka	Jane Bennett	Bryce Timperley
Aimee Hamlin	Jan Chaplin	Anne Lacey
Glenys Smith	Ben Spick	Chris and Carole Hill
Lisa Terry	Murray Holt	James & Sheila Murray

Jared Banks	Rose Gilbert	Shayne John Rusbatch
Sam Stocker	Verna & Warren Holland	Pete Familton
Alan Cowden	Cathy Wallace	Jo West
Giselle Fletcher	Kevin Hewitt	Victoria Young
Natalie Roetz	Laura O'Connell Rapira	Emily Manning
Ann Pratt	Michael Sarfaiti	Wayne Powell
Nadine Norcross	Bern Flaxman-Hendriks	Sean Molloy
Duncan Crosbie	Tommy Cushnahan	Peter Sharp
Jill Balfour-Smith	Anne Fitzsimon	Lesley Chalmers
Kris Gallagher	Corinne Reid	Lavina Diamanti
Linda Jury	Nita Harding	Michele Reichmuth
Ryen Carlson	Erin Krebs	John Fritchley
Kate Neill	Bridget Thompson	Erik de Boer
Rachel Jamieson	Chris Riley	Jason Farrow
Cllr Solitaire Robertson	Kirsten Jardine	Nicky Hamilton
Shane Avery	Megan Alexinas	Jim Simpson
Karen Anderson	George Doel	Elizabeth Mather
Marla Poor	Jared Banks	Kasia Pawlowska
Anne Taylor	Mark Sandford	Jan Mace
Julie Insley	Sylvie Gaignant	Ian & Sue Geddes-Cook
Brian Herlihy	Jan Voss	Tony Healy
Andrew McArthur	Kent Fung	Raewyn Radich
Ann McSweeney	Pieter van Miltenburg	Heather Tee
Holly Sterne	Megan Devillers	James Craigen
Vanessa Herbert	Stephen Keach	Deborah Craigen
Kirsten Addison	Lynne Gilchrist	Jocelyn Walker
Kenneth Muir	Pras Chowta	Pam Timothy
Adrian May	Paul O'Connor	Warwick Mather
Shirley and Ian Maguigan	Lindy Kelly	Lisa Davies
Aasha Morrison-Essex	Susan Allison	Olivia Gunn and Phil Garaway
Joy Deith	Aynsley Downie	

Glynis Shields	Jo Austin	Barbara Hearn
Beverley Reid	Tosha da Vinci	Avril Mcintyre
Tony Fox	Nikki Pileff	Krissy Broderick
Peter O'Neill	Judith Robinson	Julie Jorey
Natasha Hamilton	Glenis Candy	Jocelyn Brazier
Vera Pointon	Jill Watson	Catherine Pollock
Lucienne Ferres	Julie Hovell	Rowena Stanton
Jan Haley	Anne-Marie Forde	Ray King
Frances Lee	Roberto Di Denia	Sheree East
Marcelo Rodriguez Ferrere	Philna Victor	Jennifer Allen
Janet Crawford	Joanne Riley	Eric Linklater
Tracy Versteegen	Jewel Inwood	Melissa Cook
Martin Hawthorne	Sy Guth	Victoria Whittle
Rob Hazelwood	Sarah Wedde	Patricia Stewart
Stephen Zanetti	Anne Phipps	Nardine Theodore
Sheila Morris	David Phipps	Lauren Riley
Leanne Macdonald	Mairi Stewart	Christine Healy
Sandra Irlam	Amber Silbery	Wayne and Julie Bell
Lynette Smith	Clinton Hoeben	Sunita Singh
Jan Robertson	Sarah Lamberton	Leone Brown
Gloria Geraghty	Alana Shinn	Peta Berry
Stefan Craddock	Charmaine Hoeben	Delwyn Monk
Gillian Murdoch	Nichole Whyte	Margaret Cotton
Mary Clarke	Amanda Koschak	Terry Carr
Shelly Jones	Sonya Wilkinson	Sandra-Jane Witana
Nathan Palmer	Diane Baker	Shona Campbell
Richard and Maree Gardner	Karen Ellen	Karen & Jon Truscott
Liz Clark	Mark Koschak	Sherlyt Jindra
Helene Street	Nicole Adams	Ann Julian
Frances Caldwell	Frank van Miltenburg	Andrew Bates
Mary Southerwood	Tracy Malone	Karen Boserio

Sean Deery	Yvonne Warnock	Stuart & Tracey Nome
Pam Douglas	Victoria Anderson	Maria van Montfort
Beatrice Cheer	Arvine Gamlin	Jenny van der Merwe
Elene Anderson	Karen Koschak	Russell Berry
Alexandra Hume	Sarah Abelson	Barbara Worrall
Barbara Alexander	Paula Clark	Michelle Androu
Nicole Brice	Ryan Mckenzie	E. Verry
Angie Thompson	Tim Julou	Graham Cliff
Marilyn Wissmer	Matt Deery	Debbie Laing
Simone Little	Richard Daniell	Dianne Warren
Fiona Constantine	Jessica Martin	Angela Mills
Pat Plimmer	Anne Deery	Maggie Moss
Rachel Du Val	George Craddock	Holly Snape
Ashley Carlisle	Natalie Jane	Lisa Snow
Chris Maisey	Stéphanie Brosseau	Jillian Latham
Carol Kerr	Sue Chaytor	Nora van der Voorden
Bill Smith	Tammy Fenske	Hazel Dickinson
Kathryn Stewart	Annie Southern	Evie Que
Casey Regtien	Denise Smith	Carey Conn
Tony Robson	Lynn Morrison-Bevan	Cheryl Travers
Linda and John Mikkelsen	Gretchen Hart	Theodoros Aslanoglou
Ella Martin	T.M. Wano	Lewis Bollard
Jon & Sharon Pike	Jorgen Hansen	Bibby Raebell
Louise Donald	Gary Doyle	Sam Chapman
Mark van Baarle and Anneke van Baarle-Bootsma	Kay King	Ammie Christiansen
Amber Downie	Evelyn & John Welsh	Taylah Findlay
Kathryn Renfro	Vanessa Vella	Margaret Crichton
Sandy Gilbert	Maretta Twentyman	Karen Baker
Shirley Herbert	Kathryn A Konieczny	Annette Whiteside
Michelle Cox	Julie Inglis	Jan Read
	Lorelle Goodman	Rebecca Henderson

Gillian Burrough	Stephen Brown	Suzanne Mitchell
Valerie Leppard	Daniel & Nicole Jackson	Lara East
Jacqueline Liebenberg	Stephanie Jones	Gillian Palmer
Maralyn Crook	Anthony King	Zelda Chapman and Wouter Grimme
Mark Dawson	Carey Hablous	Trish O'Callaghan
Shirley Wilshire	Allie Caddie	M Pitcher
Stephen Andrews	Glenda OBrien	Judy Fisher
Elizabeth Fouhy	Rae Robinson	Warren Harding
Emma Darby	Lisa Valois	Brian Aitken
Kelsey Hayward	Terry Bowden	Karen Edney
Sue Harishun	Maya de Larratea Dent	Sarah Ballard
Jo Macdonald	Travis Saying	Julia and Anne Shackleton
Erin Thomson	Fiona Jack	Merrin Fowlie
Robyn Fond	Alexander Ritchie	Corum Neilsen
Karen Hart	Andrew Whitehead	Kiri and Mike Smith
Michael Wauters	Michelle Bishop	Jenny Weston
Dr. Ursula Udgington	Melanie Harrison	Melanie Lewis
Ian Geddes-Cook	Kylie Walgos	Eugene A Klein
Luzelle Cockburn	Sasha Unverricht	Lucy Adamson
Dr Graham Cliff	Yvonne Langridge	Christian Williams
Melane Gimblett	Nicole Ford	Alexandria Purvis
Rae Bank	Savanah Gwatkin	Emma Hockley
Paola Catapano	Danielle Schouten	Stacy Currin-Steer
Nancy Baker	Geraldine Lawrence	Larah Boshier
Teresa Crawford	Juliet Eden	Melanie Rovers
Jayne Blakemore	Marlia Fraser	Felicite Jardine
Josh Mackenzie	Mark Rocket	Warrick Mould
Brent G Tassell	Bridget Smeeton	Lisa Gant
Krystyna Fajkiel	Sharon Broderick	Michelle Holloway
Crystal Mckenzie Blair	Holly Cushen	Gabriela Stelescu
	Karl Ross	

Jennifer Hyde	Rosalind Atkinson	Maria Schulz
Anna Heyward	Helen Gummer	Donna Estele Ponga
Berghammer Annette Germany	Ilse-Marie Erl	Karn McIntosh
Rochelle Gibson	Jayne Hartstone	Chris Holder
Miriam Williams	Werner Corbe	Jane du Flou
Jesse Campbell-Trotter	Helen Smith	Anne-Marie Bright
Alan James	David Broadhurst	Kelli Reynolds
Diane Gregor	Stephanie Adams	Heather Sinclair
Alana Troake	Jo Davies	Leonie Murray
Vinti Singh	Isabella Wilson	Sethrin Tatu
Otto Rovers	David Hancock	Ken Dixon
Erin Brown	Ken Smyth	Eva Lopes
Jo Wrigley	Julie Stuart	Stacy Caudwell
Tania Thomson	Viviana Franca Rossini	Vivian Chhan
J & M McLeod	Rebecca Smith	Elsina Schepers
Tanya Lyders	Marysia Coombe	Jennifer Terry
Julia Burgess	J Williams	Linda Barnes
Elizabeth Barron	Jo McIntosh	Janine Ketting
Glenys Harwood	Jim Scrivener	Azura Victoria
Bridget Harris	Basil Hammerton	Annette McGuinness
Eller Reilly	Mackenzie Aitken	Ella High
Jared Smith	Alex Aitken	Rosemary Richards
Sarah Goodhew	Astrid le Roy	Stacey Keast
Jeremy and Valerie Byrne	Jenni Payne	Luke Christiansen
Margaret Joppa	Elaine Watkins	Kim Munro
Jess James	Michelle Sheahan	Heidi Ankers
Raksha Rughani	Dr Toshala Elliott	Elle Laus
Victoria Bray	Deirdre Balaam	Yves Garin
Carole McIntosh	Robyn Griffin	Margaret
Chris & Annette Schnack	Nina Clausen	Kathleen Ford
	Natasha Spittle	Daniel Burmester

Charlotte Burmester	Stephanie Flegg	Kathryn Beckingsale
Mikayla Prout	Hugh Halliday	Mitzi Frank
Susan Yorke	Maria Simmonds	Tracey Hayston
Jeanne Dutto	Doug and Lynda	Kiya Nancarrow
Jean-François Dutto	Susannah Gardner	Jesse Singson
Rose Arthur	Anne Panhuis	Suzanne Lebon
Alexandra Dempsey	Sonia Millikin	Kelly Regan
Jude Pratt	Tia Hibbert	Nicole Miller-Hard
Anna Howes	Rosemary Carter	Greg Miller-Hard
Alisha Harlett	Pete Green	Odette Miller-Hard
Robert J Dodunski	Brigda Loona	Francesca Miller-Hard
Michaela Pospisilova	Marie Dutto	Sophie Parker
Maegan Shanly	Anna Bulkeley	Alan Parker
Rohana Weaver	Emma Kerr-Laurie	Scott Parker
Rosemary Dahl	Teresa Guttenbeil	Meredith Knight
Sandy Burmester	Sue Norwood-Evans	Peter Galbraith
Maria Van de Putte	Julie Fergus	Martha Goodhue
Deana Johnson	Kirsten Taylor	Janet & David Lott
Dr Cath Rivron	Yvonne Robinson	Lisa Gabel
Elizabeth Pack	Kerry Anne Macdonald	Judith Bassett
Glenys Bean	Dayle Lee Jones	Fiona Rickards
Jennifer Gorbey	Maria Del Pilar Barranco Alcantara	Michelle McLeod
Shirley Wells	Glen Munn	Asta Wistrand
Tangent	Rosalie Sinclair	Christine Machanek
James Walsh	Kelly Hyde	Phillips Simmons
Tessa Hiscox	Andrew Gunn	Sai Law
Fiona hansen	Barbara Albertson	Annie Ledezma
A. Lohead	Jos van den Akker	Julia Thomas
Sue Dewe	Frida Inta	Graeme & Margaret Bluett
Bronwen Chapple	Andrea Ann Kepes	Gil & Hemda Levy
Brian Flegg		Joanne Rodger

Sophia Trussell-Cullen	Russell Holmes	Christine Josselin
Maree Corrin	Jessica Daugherty	Kevin Vaught
Debbie Kelly	Biendan Sapeau	Mike Rossa
Gail Anderson	Taryn Aspeling	Suzan Hussain
Sophie Mills	Amy Grove	Antonia Allum
Ruby Malone	Wendy Hawkins	Line Ringgaard
Helena Pope	Karen Kelland	Kristy Yarrow
Jo Pervan	Rick Bazeley	Ashlee Mcevoy
Yvett Irwin	Caroline Barrett	Maree Erkkila
Andrea Smith	Deborah Lees	Ashlee Trainer
Lynn Sinclair	Janice Zane	Beate Jones
Louise Coleman	Wendy Stephen	Marisa Lupis
Bibby Raebell	Kate Morgan	Matt Molloy
Judy Hylton	Jeff Hunt	Gareth Kear
Natalie Van Leekwijck	Mary Fitzpatrick	Claudia Page
Angeline Day-Mesure	Jasmijn Van Mele	Elle Haring
Joy Maskell	Susie Ngamsuwan	Kathy Milligan
Katrina Conway	Lorraine Dumas	Peter Salmon
Bronwyn Ward	Christine Dyer	M Wright
Vicky Henry	S Carter	Nicky Delaveau
Dr Maria Hurley	Sudeshna Ghosh	Belinda Teasdale
Michael Ford	Ros Giliam	Otis Williams
K Celia Grigg	Hester Bongers	Bunty Condon & Hilary Condon
Carolyn Russell	Steve Palmer	Helen Dunn
Anna Pynenburg Smith	J. Marvy	Joletta Winter
Phoebe Taylor	Sharon Brown	Barbara Kelman
Jordan McConnochie	Linda Sperring	Judith Hopkins
Glenn Bromell	Michelle Carter	Jade Mcintosh Dona
Sue Sommerville	Shayne Westerlaken	Wendy Kempsell
Amanda Stevenson	Maree Erkkila	Peter Collins
Sarah Gamble	Mary Johnson	

Imogen Cullen	Reece Baker	Dr Lindi Engelbrecht
Mary Maireroa	Yvonne Amery	Nikki Roberts
Zoe Williams	Shelley Judd	Paula Simons
Lesley J Blissett	John Howes	Klara Kiss
Kelly McLaren	Jacqui Loates-Haver	Fiona Kearney
Mel Welford	Annica Eriksson	Anne Benson
Emily McDonald	Eden Clarke	Ruby James
Phil & Jane Peters	Alison Hedges	Laura Tolpeznikova
Maxine Cross	Dr Beulah Dunstone-Leitch	Patrick Bleakley
Deanne Harvey	J.S. Thew	Mikaela Mason
Lee Suzanne	Nic Jones	Cynthia Henry
Claire Baby	Honora Renwick	Amy Goodinson
Sophie Toutain	Grainne Patterson	Ron Miller
Ella Mead	Meryl Pinque	Gerry Morris
Connie Winslow	Bob Starr	Elisa McLean
Pam Armstrong	Susan Caldwell	Nina Mayard
Andrea Newman	Jennifer Parrish	Debbie Garland
Lisa Leader	Staci de Geest	Holly Waugh
Kate Pickard	Michael Freeman	Elizabeth Clifton
Priya Bani	Erica Kirby	Jen Godfrey
Dr Troy Coyle	Pip Mayne	Houston Wong
Alex Sorbi	Kimberley Berends	Lidia Williams
Susan M.J. Gay	Diya ParMa	Mara Davison
Natasha Ornik	Vesna Cotterill	Georgia Dix
Philippa Wadsworth	Suzanne Unthank	Thea Lyle
Marie Rovers	Nina Cosgriff	Fallon Voroshine
Wendy Hall	Clarinda Stirling	Dave Smith
Wendy Waltenberg	Veronica Radosa	Sharon Page
Vivienne Watters	Sue Smith	Belinda Wylie
Margaret Graham	Tessa Laird	Alana Gerber
Jaimee Leicester	Dr Jenny Maybin	Kathy Lane

Philip Merry	M K Absolum	Elena De Fanis
Rosemary and Frank Krsinich	Kat McAra	Emma Naidu
Abbey Tiria	Jo Robinson	Susan Hauswirth
Lyn Jefferies	Leaerne hollowood	Linda Wells
Jocelyn Tong	Dr Jana Fernando	Katherine Christie
Jessica Clark	Jill Kelly	Portia Jackson
Margaret Head	Charmaine McLaren	Sara Stretton
Nerissa Sowerby	Ian Fleming	Janet MacFarlane
Melissa Dawson	Rebecca Odlin	Roz Wheeler
Lindley Naismith	M. Galon	Bronwen Nelmes
Richard Dobson	MaryAnne Paterson	Daniel Ryan
Karen McCarthy	Deborah Bluhm	Andrew McCall
Paul Baron	Jools Scarlett	Judi Soutar
Jan Chudleigh	Debrah	Claire Stafford
Kathrine Ross	J M Wilson	Michelle Hayward
Deirdre McMahan	Taz Butler	Camilla Hamann Olsen
Hugh Tomlinson	Pascal Gillies	Jaewyn Williams
Claire Crosbie	Sharyn Barclay	Christine Fairless
Tandi Lidgard	Rita van Goor	Maureen Calder
Penny Smith	Susan Buckland	Tracy Phua
Catherine Wiechern	Karin Meulendijks	Chrissie Cleary
Marian Hawke	Diana Barrett	Christine Johnston
Nicky MacDonald	Kara Welsh	Peter Elbeshausen
Megan Otto	Lorna Hermans	Rosanne Newton
Cathy Dee	Renata Johnston	Keryn Morten
Kristin Carmichael	Wong Seck Hor	Anne-Maria McKeague
Ashleigh Kooyman	John Cole	Mary Fussell
Joanna Hopkinson	Carmen Fenner	Suzanne Gilbert
Sophie Buller	Ruth de Villiers	Rosemary Lavin
Fleur Auber	Dr. Michael-John Turp	Kim McIntosh-Dona
	Danny Mulheron	Cherry Rogers

Michelle Kiamil	Zephania Locker-Lampson	Paul Read
Andrea Dennis	Kim Verschaffelt	Brendon Smale
Georgina Wells	Lisa Grace	Sarah Turner
John Brusen	Virginia Simcock	Lesley Kaiser
Rachael Harwood	Shane Stachyshyn	Julie Harrison
Hsiou-chen (Melissa) Kung	Dianne Rampton	Jodi Bell
Samantha Hepburn	Sarah Gregory	Mark Steele
Jeanette Nestved	Cheryl Firby	Jennifer Riley
John Barnett	Max Coyle	James Smail
Jo Coffey	Melanie Rutherford	Dawn Mills
Cathy Todd	Wallace T Keown	Sarah Roblin-Smith
Briar Elliot	Nadeen Mitchell	Helen Sansome
Michelle Dunn	Joy & Gareth Houghting	Mike Hanley
Anita Robinson	Janine Parkes	Wendy Sporle
Helena Toren	K Pennell	Madeleine Child
Chris Del	Amnon Schwarz	Dawn McNaughton
Marielle Haringa	Anthea Brown	Karise Dell
Jane Mortimer	Margaret Dawson	Stellar Kristel
Robin Cameron	Marilyn Mills	Bernard Fears
Susan Woodbury	Olivia McKenzie	Sue Barley
Jenni McLaughlin	Ed Abdool	Ange Murtha
Colin Lawry	Pamela Belsham	Laurel Devlin
Moki Tamati	Julia Ilich	Diane Smith
Sam Young	Merrin Cavel	Robert Williamson
Lia Furst	Alysha Calder	Leanne McTear
Tracey Miller	Amy Ramsay	Sandra Meyer
Helen Borne	Caroline Harrop	Barbara Hawker
Bridget Murdoch	Alana Sullivan	Nina Hofmann
Andrew Habershon	Dianne Foley	Cheryl O'Connor
Johanna Vroegop	Leeanne Ford	Jess Goodman
Matthew Rout	Elisabeth Moore	Karen Yorke

Louise Quartley	Kelli Lamare	Johnathan Smith
Gary & Davina Stephenson	Mark Blanchfield	Rebecca Wells
Amy Judd	Dr J Wilson	Georgia Olsen
Alison Clay	Darin Grenz	Lesley Munro
Natarsha Fuldseth	Sue Williams	Candice Robbins-Goodman
Japhia Brooks	Jan Hall	Jason Pye
Andre de Haan	Tim McGowan	Sean Foster
Jacqueline McGraw	Cam Henderson	AnnMarie Hughes
Stacey Power	Amira Brock	Ted Gane
Christina Rock	Kimberley Carter	Rosie Julou
Cheryl Hocking	Arnold Chamove	Robyn Gaskin
Kirstin Chapman	Paul Coles	Michael O'Neill
Sue Angove	R J Shorten	Sue and Ashly Braggins
Diana Falconer	Irina Iylova	Philip McKibbin
John Dyer	Abi Mercury	Tracey McIntosh
Karen Edney	Sandra Greenwood	Sheena Jones
Valerie Walker	Helen Gilbert	Hannah Wylie
Dr Anastasia Shadrina	Dr Angela Mackie	Frances Broadhurst
Chantal Vanderlinden	Lois Stone	Lyn Dunscombe
Michelle (Shellie) Mears	Hugh Rose	Noeline Gannaway
John Henry	Kate Melzer	Wendy Bruning
Danika Tana	Pia Carpenter	Carrie Tolley
Taylor Pascoe	Shelly Turner	Paul Godbaz
Garrick Batten	Claire McRae	Ingrid Douglas
Garrick Batten	Glenn Boyle	Sharron Wakefield
Debbie Munro	Cara-Lee Adams	Ann Ross
Alastair Clicquot	Melissa Shannon	Patricia Brookes
Loretta Hazel Westbrook	Lisa, Martyn & Cassidy Slade	Stephanie Lane
Stuart Davison	Trisha Blankley	Trina Burt
Shelley Krieger	Robert Docherty	Micah Dash
Nigel Wilson		Elizabeth Kendal Riches

Stephanie Lane

Rochelle James

Michaela & Phil Cructchley

Amelia Rogers

David Tuart

Kathy White

Barbara Hyde

Gareth B Williams

Michelle Gibson

Diane Riley

Angela Simpson

Roger Beattie

Jason Singh

David Fifield

Jenny Doyle

Gareth Williams

Stephen Mulholland

Kristen Fraser

Appendix F: Specific proposals to be progressed

Regulatory projects to be progressed in 2017

Proposal No. (from discussion document).	STOCK TRANSPORT AND FARM HUSBANDRY
1	All animals – Electric prodders
2	All animals – Use of goads
31	Cattle – Milk Stimulation
32	Cattle and Sheep – Vehicular traction in calving and lambing
33	Cattle and Sheep – Ingrown horns
34	Stock transport – Cuts and abrasions
35	Stock transport – Animals with ingrown horns
36	Stock transport – Animals with bleeding horns or antlers
37	Stock transport – Animals with long horns or antlers
38	Stock transport – Lamé cattle, deer, pigs and goats
39	Stock transport – Animals that cannot bear weight evenly due to injury
40	Stock transport – Pregnant animals
41	Stock transport – Animals with injured or diseased udders
42	Stock transport – Cattle or sheep with cancer eye
66	Cattle – Tail docking
67	Cattle and sheep – Castration and shortening of the scrotum (Cryptorchid)
68	Cattle, sheep & goats – Disbudding
69	Cattle, sheep & goats – Dehorning
71	Sheep – Mulesing
	COMPANION ANIMALS
5	Dogs – Injuries from collars or tethers
6	Dogs – Muzzling a dog
7	Dogs – Dry and shaded shelter
8	Dogs – Dogs left in vehicles
9	Dogs – Secured on moving vehicles
29	Rodeos – Fireworks
61	Dogs – Dew claws
62	Dogs – Tail docking
12	Crabs, rock lobster and crayfish – insensible before being killed
13	Goats – tethering requirements
14	Horses – Use of a whip, lead or any other object
15	Horses- Injuries from equipment such as halter, head ropes and saddles
16	Horses & donkeys – Tethering requirements
78	Horses – Castration
21	Llama & Alpaca – Injuries from equipment such as halters, head ropes and packs

Proposal No. (from discussion document).	LAYER HENS
17	Layer hens – Transitional dates to prohibit the use of conventional cages
20	Layer hens – Induced moulting
	PIGS

24	Pigs – Dry sleeping area
25	Pigs – Lying space for grower pigs
26	Pigs – Dry sow stalls
27	Pigs – Size of farrowing crates
80	Pigs – Castration
81	Pigs – Tail docking

Regulatory projects to be progressed in 2018

All proposals reflect the need to address implications of new criteria defining Significant Surgical Procedures coming into effect in 2020.

Proposal No. (from discussion document).	TAIL DOCKING/ CASTRATION
74	Horses – Tail docking
70	Sheep – Tail docking
79	Llama and alpaca – Castration
85	Rooster – Caponising (rooster castration)
	OTHER SURGICAL PROCEDURES – PRODUCTION ANIMALS
51	All animals – Hot branding
52	All animals – Embryo collection via exteriorised uterus (surgical embryo transfer)
53	All animals – Laparoscopic artificial insemination (Laparoscopic A.I.)
54	All animals – Liver biopsy
63	Cattle – Teats
72	Deer - Develvetting
82	Birds- Pinioning or otherwise deflighting a bird
83	Poultry – Dubbing
84	Ostriches & Emus - Declawing
64	Cattle – Claw removal
	OTHER SURGICAL PROCEDURES – COMPANION ANIMALS
56	Cats – Declawing
59	Dogs – Dog debarking (and devoicing of other species)
57	Companion animals – Desexing (including stray/feral cats, dogs and other species)
60	Dogs – Cropping the ears
58	Dogs – Freeze branding
75	Horses – Rectal pregnancy diagnosis of horses
76	Horses – Rectal examination of horses
77	Horses – Caslick’s procedure
73	Horses – Blistering, firing or nicking
Proposal No. (from discussion document).	DENTISTRY
55	All animals – dental work Note – part of a wider piece of work around dental work generally.

