

Ministry for Primary Industries - Proposed Animal Welfare Regulations Advocacy Stakeholder Workshop - 4 May 2017

The purpose of the workshop was to discuss the regulatory proposals and how we can build on the work to date to ensure the proposals are practicable and effective.

Stock Transport and Farm Husbandry

Electric prodders

- MPI is trying to prohibit the use of electric prodders on young calves/cattle or particular species which are smaller or more prone to stress. Weight is used as a proxy for age because age is difficult to determine and therefore enforce. Prodder use is also restricted to the hind quarter muscled area of the animal.
- How will enforcement people gauge weight?
 - It is an issue but weight is a more effective measure than other methods because you can gauge weight within a range by looking at the animal. For example, age is harder to determine.
- Participants felt that this regulation could be open to challenge unless it is really clear. The use of electric prodders should be fully prohibited, but provide a defence to protect human life (only). To protect injury could be allowed as well if to protect life is too high a threshold.
 - It may be difficult to determine if someone was using a prodder for protection. This could be subjective, which then becomes a complex legal argument that is not suitable for an infringement.
- Participants felt that well trained handlers and good facilities should mean that there is no need to use electric prodders.
- Participants were happy that the weight restriction for use on cattle had gone up to 200kg and that use is restricted to the animal's muscled hindquarter area.
- Some participants were concerned with the use of electric prodders when loading slaughter pens.
 - This has been included because it is in the best interests of the animal to get through the process as quickly as possible.
- Participants generally agreed that we need better designed slaughter houses to eradicate the use of electric prodders.
- Participants felt the only time electric prodders should be used is when there is risk to human life.
- The group said that the regulation should not allow electric prodders to be used in rodeos or in situations that are not essential. They should not be used in events that are not essential for farming.
- Participants were concerned that dairy cows have not been excluded. There is a risk that it will become usual to use prodders. The regulation will signal they can be used.
- Participants felt that MPI should include a definition for 'hind quarters' because this could be hard to interpret.
- Some participants felt that this regulation will legitimise the use of electric prodders without looking at the system as a whole and how we could fix the system so they don't get used.

- MPI reminded the participants that the regulations, not just this one, reflect existing minimum standards in codes of welfare. However, for this regulation the codes are not consistent across the board.
- The vast majority of participants agreed that electric prodders should only be used when there is a risk to human life.

Goads

- Participants felt that:
 - the regulation should include and noses. Use of goads on injured or diseased parts of the body should also be prohibited
 - goads should not be used on old or disabled animals
 - we shouldn't use the term goad as a lot of people don't know what that is
 - goads should only be used in circumstances necessary for a vet examination
 - the regulation should be consistent with the electric prodder proposal in terms of only allowing use on the muscled parts of body
 - the infringement fine for goads and electric prodders should be \$500 for a person and \$1000 for a body corporate
 - there should be a limit to the amount of times you can prod an animal with a goad or an electric prodder.
- MPI reminded the group that serious offending such as unreasonable repeated use or prodding injured or diseased parts of the animal would be covered under the Act. The infringement is focused on lower level offending.

Stock transport

- What does MPI mean when by 'transport'?
 - MPI: Taking an animal off farm for sale or slaughter (change of ownership). Under the National Animal Identification and Tracing system (NAIT) one farm can be covered by pieces of property that aren't next to each other but within 20km of each other.
- 20km is a fair amount of travel for an animal that would otherwise need a vet certificate to be transported. Could be 20km gate to gate, but could be more extensive than that if the animal needed to go to a further part of the farm. A vet should be called out.
- The regulation needs to be clear that moving animals out of harm's way will not be subject to the regulations when there is an emergency.
 - MPI: An emergency needs to be defined. What is the adverse event, natural disaster, or imminent danger? This should cover unexpected events and not drought.
 - MPI: We need to consider when an offence should have an infringement penalty and when it should be a prosecution. Offences are on a continuum and we may need to litigate.
 - Our preference is to keep discretion to decide what the best avenue/penalty is for an offence.
 - Need flexibility to deal with serious offenders and recidivist offenders.
 - Where should liability rest for pre-existing conditions e.g. cancer eye, ingrown horns, lameness, udder issues?
 - Where the animal was clearly unfit when it got on the truck:
 - Who should be primarily responsible?

- The supplier or transporter?
 - Transporters think suppliers have a lot more culpability. However, there may be reasons where it may be more appropriate to give an infringement to a transporter.
 - We have options. In some circumstances we may prosecute the transporter under the Act. However, making the supplier liable will probably make the behaviour change we are seeking. Alternatively the supplier and transporter could both be liable and operational guidelines could be developed on who to infringe.
- Participants felt it was important that both the supplier and transporter be liable.
- Participants also expressed support for discretion to decide best outcome. Didn't want to be boxed in by upper limits (defining a hard line between regulation and prosecution offences based on physical injuries when other case by case factors are just as important).
- How is MPI going to make sure that vet certificates aren't abused by farmers for transport?
 - MPI: The New Zealand Veterinary Association (NZVA) has guidelines on issuing certificates. Under the guidelines the vet who issues the certificate must assess the animal in person. Further, if an animal arrives in a poor condition at a slaughter premises and the MPI Verification Services (VS) vet thinks that it was a poor use of vet certificate then the matter can be referred onto MPI compliance for investigation.
 - MPI VS vets are at all meat processing plants in NZ. However, Petfood plants don't have vets on site at all times, but have cameras on premises.
 - Alternatively the matter could be referred to the Veterinary Council of New Zealand (VCNZ).
 - NZVA will also reviews its members to see how they are performing and see who need re-training.
- MPI: Would participants be comfortable with fit for transport certificates being issued by technicians?
 - Participants: We would not support certificates being issued by non-vets. If a vet can't see the animal it should be slaughtered on site.

Cuts and abrasions

- MPI: under the Animal Welfare Act the transporter is responsible for the transport of animals.
- Participants were concerned that if offences for cuts and abrasions are set at an infringement level it will be difficult to take a prosecution for serious cases.
- Some participants opposed the use of the phrase 'cattle-beast' and would prefer the regulations refer to 'cattle'.
 - MPI: The Animal Welfare Act and the regulations are based on single animals. The term cattle-beast is used in to as a singular for cattle. The English language is relatively deficient in non-specific terms for a single bovine animal.
- Participants suggested the regulation could refer to 'stock animals' and then define it?
 - MPI: However, there are some animals to be covered that aren't always stock, such as horses or pigs.
- Participants: Injuries need to capture all injuries and cuts OR abrasions.
- Participants: What if the cattle had facial eczema and the scabs came off in transport?
 - MPI: Some farmers don't think this situation should be covered by the regulation, however if a scab comes off and there is a bleeding wound it will be left to the discretion of the enforcement agency to decide if an infringement should be issued.

In some cases it may be considered that the animal should have had a vet certificate or should not have been transported.

- Participants: What if the size of the abrasion is far too large for an infringeable offence? We consider this regulation as trying to band-aid the bigger issue in the industry which is crate sizes.

Cancer eye

- MPI: The regulation will make it mandatory to have a vet certificate to transport cattle, sheep and goats with cancer eye above a threshold.
- Participants suggested several thresholds would be required for different animals (as they have different sized eyeballs), so there could be some difficulty there. It needs to be proportionate to the size of an animal, and a definition of cancer eye needs to be included for clarity. The definition should not be limited to external evidence of cancer eye. There needs to be education about the fact that the cancer can be internal as well. This also may be an issue for stock that aren't seen on a regular basis.

Pregnant animals

- MPI: There are some issues around defining genuinely premature birth. The transportation period for pregnant hinds reflects the existing requirements in the industry.
- Participants: Will the same rules apply to lifestyle deer? MPI: Yes
- Participants stated they have an inherent issue with transport of pregnant animals in general. New Zealand should be more in line with the UK, EU, and the OIE.
- Participants also had issues with blood harvesting and stock sent to slaughter premises in late pregnancy.
- Participants suggested that discretion could be used when unintentional pregnancy in a line of hoggets.
- Some participants not totally comfortable with allowing transport of late pregnant animals to farms either, should 24hour rule apply to farms as a destination as well?

Lame stock

- MPI: Issue is providing clarity about when this is an offence and when it is not. There are also issues around the disparity between Transport Code of Welfare and the other Codes.
- MPI: Most people suggest the threshold should be that the animal is able to stand and bear weight.
- Participants acknowledged that assessing and defining levels of lameness is difficult. There are differences between when the animal is moving and when it is standing still and may favour a leg.
- Participants asked how injuries during transport would be addressed as opposed to chronic injuries.
 - MPI: is considering how to most appropriately hold transporters to account for injuries that occur during transport.
- Participants suggested it is important to keep the options of holding either party responsible open for transport offences.

Stock transport – ingrown horns

- Participants couldn't see any reason a vet would provide a vet certificate for an ingrown horn. If they were on site they would treat the ingrown horn. However, didn't think there was any harm in leaving it in the regulation either.
- Participants were okay with transport within farm for treatment of ingrown horns.
- Participants suggested that dairy cattle on run-off blocks would be unlikely to suddenly develop an ingrown horn. Young stock are disbudded and don't have time to develop horn issues. Older stock have been dried-off on the milking platform two months ago so shouldn't have time to develop any horn issues either.

Pain relief proposals

- MPI informed the meeting that some of these proposals require pain relief where previously this was not required. There are a number of ways in which pain relief could be provided. Submissions told us that in some scenarios it is difficult for the non-vets to access pain relief for various reasons.
- MPI is trying to facilitate a process so that vets can feel comfortable prescribing drugs to non-vets. Various things need to be considered like what training is necessary, and what right of recourse a person may have if they are not given access to drugs. It must also be recognised that at the end of the day the vet should have the right to say no to supplying drugs when reasonable (as they are ultimately responsible for drug provision). These complexities mean that the commencement of this proposal may need to be delayed.
- In terms of disbudding some people have told MPI that some methods are not painful.
- MPI is seeking any information in relation to disbudding goats and their reactions to pain relief. Information is also sought on different options in relation to analgesics and other ways we can reduce pain.
- Participants:
 - were very supportive of the requirements to provide pain relief. We would also like to see post-operative pain relief provided
 - felt that the regulation should be clear that disbudding should only be performed once you are sure the pain relief has worked. Clove oil has been shown in research to be effective
 - would like to see caustic paste banned.
- MPI explained that they are not entirely convinced that we know enough about caustic paste at the moment. If it is done well some people say it is better than a hot iron. Its best done at 1-2 days old as the buds are smaller and the animals react less. However, local may not work as well as it should be when caustic paste is used.
- Participants explained that from their point of view it doesn't matter how much local anaesthetic is used caustic paste should not be allowed to be used at any age. If there is an intention that local anaesthetic be used and there is evidence that it may not be working for caustic paste then there is an issue if this is put in regulation.

Dehorning

- MPI explained that tipping is hard to define. There may need to be discretion for tipping.
- Participants felt that tipping should only apply to the hard tip of the horn in any scenario, trying to dehorn the part that bleeds should be infringement.

- Both MPI and participants acknowledged that vets say that even good vets will get occasionally miss the tip. You don't know you've breached it until you've done it.
- What about ingrown horns in emergency situations where pain relief is not readily available? Should you tip or wait for pain relief?
- Some participants felt that from an animal welfare perspective it will be better to cut it off. However, we still are of the view that the animal shouldn't have gotten to that situation in the first place.
- A participant asked if we know how long the nerve feels painful for if you miss the tip. It will be interesting to know how long the pain lasts.
- MPI told the group that comparisons had been made with cutting a toenail, however that was about as much as was known at the moment.
- Participants agreed that pain relief should include post-operative pain relief
- MPI explained that the pain relief requirements at the moment only provide relief at the time of the procedure.
- Participants agreed that the deterrent for de-horning needs to be more than a compliance notice.
- Some stock transport proposals aren't progressing. For example, twisting an animal's tail is too difficult to define in any logical or sensible way, and teat occlusion which we need to do further work on to define.

Companion animals

- MPI said that there were a couple of proposals that they didn't want to discuss at this meeting as they are very controversial, particularly dog tail docking and dew claw removal. Discussing these proposals would take a lot of time so they will be discussed separately.

Dogs: pinch and prong

- MPI decided not to take this proposal ahead at the moment. Submissions supported the regulation but there was concern that we weren't considering other types of collars. We will look at this in the future in the context of all collars (one of the next packages of regulations).
- The National Animal Welfare Advisory Committee (NAWAC) also need to consider this proposal/issue. There is evidence to support that in some cases it is better to use pinch and prong collars on working dogs than to use other choke chains.
- Participants agreed that there is data to support the observation that choke chains were worse than pinch and prong collars, but they didn't support the use of any of these sorts of collars.
- Participants asked if it was possible to restrict the sale of pinch and prong collars.
 - MPI: we have advice that this might be possible but we would need to confirm this.

Dog and cat drowning

- MPI: This proposal was strongly supported in submissions, however in retrospect we think this should stay an offence under the Act because we don't want to downgrade the seriousness of this offending.
- MPI: The proposal also didn't regulate other ways of killing dogs and cats e.g strangulation. This may accidentally signal that it is ok to kill dogs and cats in other ways.
- MPI: We need to have an ongoing discussions on how we deal with the killing of animals.

Dogs: Collars and tethers

- MPI: A lot of submissions asked that this proposal be extended to apply to all animals so we are considering this.
- MPI: This relating to animals that are tethered by the neck (not halters etc.). The offence is to capture cuts and abrasions. This is quite a high bar to ensure that collars growing into the skin are covered by the regulation.
- MPI: The regulation doesn't cover hair loss, and we have stipulated abrasion so that chaffing and abrasions are covered. The intention is to prosecute for raw and bleeding abrasions.
- Participants were more concerned about the amount of time animals are tethered. We know time wasn't consulted on, but from a psychological welfare perspective long term tethering can cause long term welfare compromises. There needs to be other forms of containment. By default if we don't have a time limit on how long a dog can be tethered for there is going to be compromised welfare.
- MPI: there is a problem with evidence of prolonged tethering for an infringement level offence, specifically, how do you know it is constantly being tethered.
- Participants were aware that this is challenging but noted a lot of complaints are made about the time dogs are tethered.
- MPI: This regulation doesn't address life-long tethering, but it can make tethering more comfortable.
- Participants said that some dogs will never be comfortable tethered i.e. arthritis. Can there be a provision that prevents the tethering of animals that are currently diseased?
- They said the tether also needs to allow to dog to access dry shelter and water, can we capture this in the regulation as well?
 - MPI: This is captured in other regulations. This regulation also covers the ability to drink (i.e. tightness of tether etc).

Muzzling

- MPI: The intent of this regulation is to ensure dogs have the ability to drink water and vomit. It is also intended that an exemption from the regulation be provided for muzzling dogs for short periods of time for safety reasons such as handling and vet examination etc.
- MPI: We are having some issues determining a time limit for this exemption.
- MPI: It could also be argued that a safe handling exception could result in menacing dogs being tightly muzzled in public to ensure 'safe handling'. We need to be careful that this is not defined that way.
- Certain participants noted that any dog under Schedule 4 of the Dog Control Act needs to wear a mask and muzzle, we only allow basket muzzles.
- Participants wanted the proposal to only allow tight muzzle for vet procedures.
- Participants: The dog needs to be under supervision at all times if it has a tight muzzle on. A dog in the back of a car is not considered supervised and should not be allowed to have a tight muzzle on. There needs to be a time limit for muzzling, we don't want dogs having any muzzle on for 24 hours a day.
- MPI: We can look into timing matters. Injuries level is cuts and abrasions again.
- Participants noted that grey hounds wear bark muzzles and that would be considered tight muzzling.

Dogs: Dry and shaded shelter

- MPI: This regulation applies to dogs that are habitually kept to one area. The regulation sets out requirements that dogs must have shelter free from through-draft and an area to urinate and defecate.
- Participants thought that this proposal needed to reflect the current minimum standards.
- MPI: It is difficult to define shelter. Need to make sure whatever shelter is provided it is shaded, sheltered, and protects them from being too hot or too cold.
- Participants agreed with the proposal but were concerned about metal shelters that are too hot in the sun.

Dogs in vehicles

- MPI: Under the proposal it will be an offence to leave a dog in a stationary vehicle if they display symptoms of heat stress, hyperventilation excessive panting/drooling or shade seeking.
- MPI: Some of the extreme indicators of heat stress such as lethargy or collapse are not in the proposal. Ventilation has also been removed from the proposal to allow those to be left open for prosecution.
- Participants: It is important to capture humidity. We agree that collapse and lethargy should be indicators for an offence under the Act.
- MPI: It is too hard to capture ventilation/humidity in regulation as these are not symptoms of the animal.
- Participants: The regulation should cover all animals e.g. cats.
- MPI: The minimum standards in codes of welfare were the starting point for developing the regulation. Currently there is no minimum standard that applies to other animals in this situation. NAWAC would therefore need to consider if it is necessary to change any of the minimum standards. Further, we did not consult on a proposal to include all other animals. Consultation would need to be conducted.
- NAWAC is looking at all codes and reviewing where these needs to change. Regulations are driving more conversations. This will be a long process.

Dogs: Moving vehicles

- MPI: This regulation is aimed at the problem of dogs falling off the trucks. We are aware that there may be a general sense that this regulation does not go far enough.
- Participants: We don't have an issue on private property, we are concerned about public roads.

Horses

- MPI: The regulations on striking and/or prodding a horse or donkey in the head should include all sensitive areas. If you need to strike a horse it should be restricted to the muscular areas of the hind quarters.
- MPI: Feedback received in submissions was that you need to push a horse's head away from time to time. Pushing a horse aside, is not considered striking.
- Participants thought that the regulations should also identify a hand as an object that should not be used to strike a horse or donkey.
- MPI: The regulation on the use of goads also applies to horses and donkeys. This regulation is additional.

- Participants: Would a whip or a lead rope be considered as a goad?
 - MPI: Yes.

Factory farming and colony cages

- Participants are strongly opposed to colony cages and factory farming.

Layer hens

- Where are the regulations relating to meat chickens? Why were they excluded?
- All minimum standards in codes of welfare were considered for regulation. The regulations being progressed are those that would be enforceable by regulations and where there are currently compliance issues.
- The welfare of broiler chickens is the subject of campaigns around the world. NZ should be jumping on this.
- Can regulations relating to meat chickens be included in the 2019 proposals?
- When MPI finish the 2018 proposals we will have a conversation with NAWAC about what else we can consider.
- Participants had some concerns regarding stocking densities. These regulations may push more layer hens into barn and cage situations. NAWAC is re-considering the stocking density for free range systems, at the moment the view is focussed on range quality and range management which are the most important factors for hens rather than the number per hectare.
- NAWAC have initiated a survey on free range layers and asked targeted questions about range management and stocking densities. This will give us more information to work on. At the moment the commerce commission is looking into free range definitions. Industry asked for a definition of free range to be developed. From a marketing view this definition might not meet the market demands. This is with the commerce commission.
- Participants are concerned about shelter and shade, and range quality. Currently this is a big problem and there is no shade and shelter, no trees etc. There needs to be more diversity of environment and cover (e.g. 3d space, shade and shelter). These issues should be addressed before regulating for stocking density.
- Prosecutable offences –How many hens/cages need to be involved before you would prosecute under the AWA?
- The intention is to have flexibility on a case by case basis. Decisions would be made on severity and scale.

Express normal behaviour

- How does a chicken ground peck in a colony cage? The floor of the cage is not the ground.
- In the code there are no requirements for a scratching pad in terms of size etc. There isn't much guidance in the code.
- Currently the industry are providing scratching and nesting material by default, through technology and cages bought from overseas, that is largely determining what the farmers are adopting as their practice.
- Participants were concerned there are no standards around this particularly because the regulation says every hen must have access.

- Having access is different to every hen having access at the same time.
- Example indicators that cover nesting areas, perch length etc. These indicate what might be done to meet a minimum standard.
- Is there a max stocking density in the codes? Yes for barns and outdoor ranging areas.
- It needs to be clear from an enforcement perspective, what the density is.

Housing design and equipment

- The wording of the regulation needs to be prescriptive to ensure people can comply.
- If it is too prescriptive this will prevent people being innovative.
- There are a lot of standards within this regulation and a lot of wording is subjective. How do we think suitability requirements can be expressed in a meaningful way?
- Adequate size and number of birds and ways to reduce undue competition need to be considered.
- This will be hard to enforce and participants were concerned about barns having wire mesh floors. However, participants hadn't come across barns having a wire mesh floors.
- The regulation must allow all birds to perch at the same time.
- In multi-tier systems it is really important that you have like for like cages for the pullets to go into. They need to be used to the type of cage they are going into. It is so important from a welfare perspective for these birds. They will injure themselves if they are not familiar with the cage.
- Participants generally felt that these regulations were being rushed and more consideration is necessary.
- The induced moulting regulation should go ahead.
- MPI can refer these to NAWAC to work on as they are not specific enough, and can ask NAWAC to consider a number of issues.
- There is an issue with transporting hens being jammed in trucks. This is a catching issue, rather than transport.
- The stocking density regulation should probably progress to ensure an enforceable transition. We should also progress the induced moulting regulations. We could then, subject to NAWACs approval, work with a NAWAC sub-group to look at the code and the regulations in relation to meat chickens, layer hens and transportation issues. However, this would mean that there may not be any answers in this space for a number of years.
- If the transition regulation is not progressed, it wouldn't be directly enforceable.
- Participants support referring these issues to NAWAC as the long term benefits outweigh the delay.
- There will be some frustration that there is not a lot of clarification around what people need to do to transition.
- MPI suggest progressing one regulation that is non-technical (induced moulting) and another regulation to ensure that the transition is enforceable. The other proposals relating to stocking densities etc. will roll up to a bigger piece of work. MPI will work with NAWAC, industry and advocacy groups on this in 2019.
- Participants noted they would need to know when this work would be progressed before we could support this approach.

Pigs Discussion

- Participants were opposed to the continued use of farrowing crates in ‘factory farming’ situations.
- Would infringements apply per animal? Yes.
- Is there a scaled infringement fine for a corporate body? Can’t see a \$300 fine being a major deterrent for a corporate body. We can file a charging document with the court, this allows the court to impose a penalty it thinks is appropriate. However, some of the regulations are prosecutable offences because these have higher fines.
- A prosecution may also be taken under the Act prosecution if the scale of offending is large enough.
- We are aware of some issues with lifestyle farmers, the \$300 infringements should help change their behaviour. It is more appropriate to take a prosecution under the Act for large scale offending by corporate farmers.

Dry sleeping area

- Some pig farmers have metal cages, this is a problem in summer and winter. There is a lack of insulation in the sleeping areas for outdoor pigs in winter. Can you look at requiring straw for insulation?
- No I don’t think we would be able to require them to have straw.
- Insulation needs to be provided for pigs in metal huts and on South Island free range pig farms. This is necessary if you are talking about a dry and draft free sleeping area.
- There will be costs associated with providing insulation and haven’t consulted on this. At the moment MPI are consulting on ‘dry sleeping area’.
- There is no current stocking density. Pigs need to stand, move about etc. It is key that requirements around these elements be put into regulations.
- These regulations are focussed on current compliance issues.

Lying space

- The proposed regulation for lying space and stocking density rules conflict. The rules are not clear enough for pig farms, clear guidance is needed. Pig vets and farmers use the equation in the minimum standards on stocking density so there needs to be a minimum space allowance, including lying and moving around space.
- MPI haven’t consulted on a minimum space that includes moving space.
- Industry are compliant with this but it is how they stock their animals to lying space. What about eco-barn farming that is not technically indoor, doesn’t this standard apply to them?
- This standards applies only to indoor farming, but probably the scope could be widened to include eco barns.
- Deep litter systems need to be covered by the regulation.
- Growing pigs inside or in eco-barns need to have lying space.

Dry sow stalls

- Under the current minimum standards after 3 Dec 2015 sows must not be confined in sow stalls after mating.

Size of farrowing crates

- The wording of the regulation ‘touching both sides of crate simultaneously’ doesn’t clarify whether this is when standing or lying down or both. Obviously she will touch the sides when she is lying down. If you leave the wording as is then the stall needs to be bigger.
- Industry haven’t raised this with MPI so we will leave the wording as is at the moment.

Nesting material

- Lifting the current minimum standard from the code of welfare is problematic. To make a regulation we need to be specific about what material farmers have/can to provide. If MPI remove the date from the regulation we would have to re-consult.
- The Code of welfare was issued in 2010, at the time NAWACs vision was that the new standard would apply to new systems that could handle the requirements around nesting.
- Why was there no transition period for nesting material?
- This is part of a larger piece of work we need to work with industry on. Similar to layer hens. There are around 116 farms that the current minimum standards doesn’t apply to because they were operating before 2010, there are 3 farms it does apply to. NZ Pork don’t represent *all* pig farmers.

Pig castration

- Participants felt that the regulation should require post-operative pain relief to be provided.

Pig tail docking

- Why isn’t there are regulation about pigs’ teeth? Why aren’t MPI looking at grinding or clipping or teeth removal?
 - This issue is being assessed in the wider package of pain relief proposals.
- 7 days is an arbitrary date to be put in regulation for pain relief to be provided. There is no science supporting this.
- If tail docking is to be done, it must be done with pain relief at all times. Even Emlar cream could possibly be used. Drugs are generally more accessible now, this is simple to use.
- Given anyone can tail dock under 7 days, is there a definition for anyone?
- This was written in the context that anyone who is competent could perform the procedure versus a vet. If someone is providing pain relief under Vet Operating Instructions (VOI) then they would deemed to be competent as a vet signed off the use of drugs. Work needs to be done to figure out how to articulate this.
- The science behind this doesn’t stack up but if you’re going ahead then there should be requirements around tail length. This is a band aid for the real issue which is lack of behavioural enrichment that leads to tail biting
- It is another regulation where we could go out and re-consult, and then work with NAWAC to redefine the minimum standard. We could then regulate in several years’ time. Or regulate now and then revisit this later.
- If MPI don’t regulate for this now its priority to be progressed would need to be determined against other animal welfare priorities. We need to be able to identify which animal welfare issues are more important.
- The feeling is that MPI should continue to progress the tail docking regulation as it is at the moment.
- There is a recommended best practice that docking should be carried out on piglets within 72 hours of birth, could we lift that into regulation? We haven’t consulted on this so not unless we consult again.

- Participants were concerned about the ability of ‘anyone’ to undertaken procedures. Please change this as the term as it is too wide.
- What methods do we consider acceptable, and what length is acceptable? You shouldn’t dock more than half a tail.
- Participants were concerned about the arbitrary 7 days in the regulation, and concern about the methods of tail docking and shortening.

RTT Update

- The regulations will require people to report on number of animals killed that were bred for the purpose of RTT. This is a minor and technical amendment that was consulted on in the Animal Welfare Amendment Bill.
- Are MPI aware of the petition on this? Yes
- How will these be reported? The information will needs to be presented clearly.
- This will be reported on the Annual form. There will be separate category in the report. The numbers of animals reported will spike due to the different recording requirements. MPI will need to ensure that code holders know how to meet the new recording requirements.
- How will MPI ensure correct reporting? Ethics approval is required to allow breeding it will be captured there.
- Participants fully support the change.

Other issues

- The intention is to seek Cabinet approval to the policy of the regulation before the House rises.