

# COMMERCIAL SLAUGHTER Code of Welfare

## Summary of submissions from public consultation January 2006

Please note that all numbered references in this report are specific to the draft code dated 12 January 2006 as circulated for public consultation. Due to additions and deletions, numbering in the final code as recommended to the Minister will vary from the draft code circulated for public consultation.

### SUBMISSION AND NAWAC RESPONSE

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	2	Would appreciate some feedback from the Advisory Group, particularly on the issues raised in our earlier submissions and not addressed in the latest draft of the proposed code. Would be happy to meet at any time to discuss these and any other matters raised in our submissions.	Noted
	3	Surveyed elected farmer and homekill representatives, and members who have indicated that they farm animals for slaughter, on their views with regard to the Code. Strongly recommends that rural butchers be exempted from this Code when operating in an on-farm capacity and that a separate Code be drafted to address their unique circumstances.	Disagree – NAWAC believes that it is appropriate to encompass all forms of commercial slaughter in the Code, and that the Code can satisfactorily accommodate the requirements of homekill operators.
	3	This Code reads as though primarily directed at meat plants; however, the Code also applies to dual operator butchers, homekill and recreational catch service providers. Federated Farmers and its industry group, the New Zealand Rural Butchers Association [7], are very concerned that some of the recommended minimum standards will compromise these operators' personal health and safety. Federated Farmers and the New Zealand Rural Butchers Association strongly recommend that this Code be entitled the "Code of Welfare for Licensed and Approved Commercial Slaughter Premises", and a separate Code be drafted to address the unique circumstances of homekill operators.	Disagree – NAWAC believes that it is appropriate to encompass all forms of commercial slaughter in the Code, and that the Code can satisfactorily accommodate the requirements of homekill operators.

	3	Supports the development of Codes of Welfare but considers that this draft Code is ambiguous, is at risk of overlapping with other Codes and includes issues which are unrelated to slaughter or animal welfare. It is overly prescriptive and would be	Noted – appropriate references to science will be included in the report to the Minister which accompanies the draft
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		<p>easier to interpret and apply to the wide range of different operations that it affects if it were outcome-based.</p> <p>Agrees that it is important to set practicable minimum standards for the slaughter of animals. Minimum standards have legal effect so it is vital that these are not too high or unreasonably rigid.</p> <p>Farmers and homekill operators want Minimum Standards to be practical and unambiguous. The current draft contains a number of standards which are vague and irrelevant to the purpose of the Code.</p> <p>It is important, in the interests of credibility and compliance, that the General Information and Recommended Best Practices are also practical and not unnecessarily prescriptive or impractical.</p> <p>Would like to see references to research and information that the Code has relied upon when setting minimum standards in particular.</p>	code.

	3	<p>Risk Management Programmes under the Animal Products Act 1999 and industry agreed standards already require a majority of the Code's proposed standards, and slaughter facilities have accordingly purpose-built their facilities to meet such standards.</p> <p>Homekill operators provide a very important service and Federated Farmers strongly considers that it is in the interests of the animals and the industry for onfarm slaughter to continue to be able to be carried out by homekill operators. Federated Farmers strongly supports the right of any person who owns an animal to be able to slaughter it, or have it slaughtered on their behalf. Nevertheless the Federation considers that in some situations it may be better that a homekill provider carries out this task in a professional manner, utilising his/her expertise and knowledge of animal welfare. When working on-farm, homekill operators face a very different environment to that found in a commercial meat processing facility.</p> <p>An animal experiences far greater and prolonged stress from being restrained and hearing noisy machinery in a plant prior to stunning, than one which is relaxed in its natural environment. The time it takes to cut an animal's throat and spine causes significantly less pain and anxiety than what it experiences when being slaughtered in a plant.</p>	Noted
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	4	Had worked with the MIA on the code and together they had developed some comments with regard to specific drafting. The suggestions raised by the MIA in their submission reflected MWNZ's views.	Noted

	7	<p>Concerned about the effect this code will have on on-farm killing on the animal owner's property. The draft code appears to have been written from the "Meat Plant" perspective. Many of our members operate a killing facility on their own premises or place as provided for in the Animal Products Act 1999 and would have no problem meeting the codes standards as the facility has been purposed built for ease of operation and operator safety.</p> <p>However, a significant number of our members do all their slaughtering on farms or lifestyle properties where they encounter many different situations which would compromise their own health and safety if we were to adhere to all the recommendations of the draft code.</p> <p>Recommends a change of name to the draft by adding PREMISES to the title somewhere, ie "Code of Welfare for Commercial Slaughter Premises". NZRBA feels this title would more clearly reflect what the code is aimed at.</p> <p>This change would give NAWAC a way to develop an on-farm code for killing animals which covers both the homekill operator and the farmer/lifestyle owner which NZRBA has heard is to happen sometime in the future.</p> <p>They feel that would be the way to safely cover the different facilities or lack of that they encounter in their daily work. Most homekill operators have developed systems over the years which enable them to operate safely and independently from the property's facilities.</p>	<p>Disagree – NAWAC believes that it is appropriate to encompass all forms of commercial slaughter in the Code, and that the Code can satisfactorily accommodate the requirements of homekill operators.</p>
	10	<p>There are two fundamental issues relating to welfare and the slaughter of poultry. They are: (a) the bird is stunned to ensure that they do not regain consciousness before they die; and (b) that the bleed out time is sufficient to cause death before entering the scalding tank.</p> <p>The Minimum Standards should lead to outcomes that ensure that these issues are addressed for commercial poultry slaughter. The Code as written while attempting to address these outcomes has proposed Standards that go beyond what is necessary to address those outcomes. The outcome can be met in a manner that addresses a range of other issues and still meets the welfare outcomes sought. The requirement set out in Minimum Standard No.18(a) on cutting of both carotid arteries</p>	<p>Noted – the reference to cutting both carotid arteries has now been moved to general information and therefore is no longer a minimum standard.</p>

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		<p>demonstrates this concern.</p> <p>The outcome set out in Minimum Standard 15(f) is that each bird must be dead by the time it enters the scalding tank. This is a key welfare issue. It will be achieved by full bleed out of the birds. Therefore the key issue is full bleed out, not severance of two arteries, rather than one. If one artery is cut but full bleed out is achieved, the welfare outcome is met.</p>	
	11	<p>Opposed to inhumane methods of slaughter of animals. For commercial slaughter, advocates the stunning of animals prior to slaughter, such methods of stunning to be capable of instantaneously rendering the animal insensible to pain until the animal is dead. Does not support any exceptions to this principle based on religious grounds.</p>	Noted
	11	<p>Thanks NAWAC for the opportunity to make this submission. Is very pleased that many of its concerns regarding the 2002 public draft of the code have been satisfactorily addressed in the 2006 public draft. Nevertheless, we have noted some remaining significant concerns regarding the current draft which we would still like to see addressed. As such, the SPCA would welcome the opportunity to make a further submission on NAWAC's revised draft of the code, following NAWAC's consideration of the public submissions.</p>	Noted
	12	<p>The draft code for Commercial Slaughter is seriously flawed with regard to its treatment of kosher slaughter (shechita).</p>	Noted
	13	<p>Suggested that a General Introduction be added, to outline the important considerations in safeguarding the welfare of animals in the pre-slaughter phase in lairage. Ruminants are usually fasted to "empty out" on the farm before transportation and if the transportation and time in lairage are prolonged, the animals inevitably become hungry. The procedures of transportation and yarding are stressful in themselves, and the cumulative effects of all these pre-slaughter phases can cause considerable distress. In practice, coordination between those in charge of the stock during each of the phases is very difficult, so it behoves the managers of lairages to ensure that all stock are killed as quickly as possible after arrival at the slaughter facility.</p> <p>(Background: During the pre-slaughter period, livestock are "emptied out" on the farm [for 12 to 24 hours], transported to the meat works [up to 8 hours] and held in lairage overnight. The total time without food can be 2 or 3 days. If stock go</p>	Noted

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		<p>through saleyards on their way to the works, it is even longer.)</p> <p>Minimising the pre-slaughter stresses of hunger, cold, and the fear and anxiety of yarding is particularly important for vulnerable classes of stock. Bobby calves and unweaned lambs and very thin stock such as many cull cows are particularly susceptible to cold and hunger. Semi-feral goats and deer are particularly susceptible to anxiety and fear. MO suggested that the introduction should include particular mention of these classes of stock and the need to manage them appropriately.</p>	
	13	<p>This draft code contains a good deal of recommendations and standards that will help to safeguard the welfare of livestock in lairage in New Zealand. However changes should be made to make the Code more specific and more useful for farmers, managers of slaughter premises and the inspectors who have to investigate complaints. MO suggested changes to make the minimum standards feasible and practicable.</p>	Noted
	14	<p>The Code seems to aim to support current industry practices rather than protecting animal welfare. Submitter is concerned that the five freedoms are losing ground. The need for comfort, which once featured in the five freedoms (“appropriate comfort and shelter”), has disappeared. Softening terms have been used to the point of near-nonsense (“minimises the likelihood of unreasonable or unnecessary”). Furthermore, the fact that economic and practical considerations can take precedence over animal welfare concerns has been specially highlighted (by describing section 73 of the Animal Welfare Act 1999 at the beginning in the “Contents of this Code” section).</p> <p>Practicality and economics can thus determine how animals are treated. Practical and economic alternatives should be actively investigated wherever welfare compromise occurs. There is substantial evidence for livestock species (including pigs, goats, cattle, deer and sheep) that welfare is indeed compromised in many ways during the hours leading up to slaughter.</p>	Noted
	14	<p>I have a major concern that the emphasis in the draft code regarding staff competency is to ensure that they <i>know</i> what to do. In reality, it is <i>what</i> they do and not what they know that is important. So checks should be made on the actual handling which takes place rather than apparent competency.</p>	Noted – the purpose of section 3 is to ensure staff are competent to carry out their tasks, while the actions of staff are covered in the remainder of the code.

	14	Writers of the code should have first-hand experience of slaughter conditions for all of the species. Only then will they be able to appreciate how and where the code	Noted – writers did have first-hand experience of all major species covered
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		needs to be very specific in order to actually achieve intended standards of animal welfare.	by the code.
	17	The final version of the Code should include an appendix which reproduces MAF's legislative responsibilities in relation to the enforcement of the provisions of the Codes of Welfare, for easy reference. It could also usefully include a practical step by step guideline for the auditing process which could be used as a prototype or template for those responsible for quality assurance programmes. For instance, it is not at all clear what would constitute "annual independent verification".	Disagree – the suggested additions provide significant detail of a nature which NAWAC believes should not be included in the code.
	18	Suggested deletion and replacement of the term "lairage" because it is not a common New Zealand term. It is more applicable to the UK where animals are kept in enclosed areas, housed in winter, etc – all slaughter establishments listed to the EC must provide lairage – indoor housing etc.	Disagree – but lairage is now defined in the glossary.

	18	<p>Recommends that standards and comments that fall outside the defined scope of the Code are removed. Also recommends that requirements that apply to the slaughter of bobby calves be included in this code and only referenced in the bobby calf code. It is further recommended that any specific market access requirements be excluded.</p> <p>In addition, in some sections, standards have been proposed that vary from the requirements set out in the international OIE guidelines. It is recommended that these inconsistencies be reviewed to ensure that the standards in the code are consistent with the international norms where this is appropriate. Where NAWAC determines that a different provision to that set out in the international norms is appropriate for New Zealand conditions, it is recommended that rationale for such differences be clarified through the inclusion of explanatory notes.</p> <p>The scope of the code is defined as “from the point of unloading at slaughter premises to the time that they [the animals] are slaughtered”. There are instances where minimum standards have been included that fall outside this scope, for example “Animals must not be selected for transport to slaughter if they are in the final two weeks of gestation”.</p> <p>Notes that while specific requirements for calves are set out in this Code, there is also a separate code for calves “Code of Recommendations and Minimum Standards for the Welfare of Bobby Calves”. For clarity, the MIA recommends that the bobby calf slaughter requirements be located in the commercial slaughter code and this code include a reference other applicable codes, such as any code that</p>	<p>Noted – any slaughter requirements contained in the Code of Recommendations and Minimum Standards for the Welfare of Bobby Calves will be replaced by requirements contained in the Commercial Slaughter Code of Welfare. Appropriate references to science will be included in the report to the Minister which accompanies the draft code. Section 4 has been removed from the code as recommended to the Minister and will now be covered in species-specific codes and the transport code.</p>
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		<p>applies to on-farm practices or to transport. Bobby calf transport requirements should sit within the transport code.</p> <p>Recommends that market access requirements which are not considered by NAWAC as being required to protect the welfare of an animal in the New Zealand context be separated out from this code and be included in the NZFSA's Overseas Market Access Requirements for that market.</p> <p>Throughout the code there are a number of requirements that are different to other international standards such as the OIE guidelines. As these requirements are (or should be) based on science we have tried to locate the source material to check for appropriateness, age, applicable conditions, etc. It has not always been possible for the MIA to locate the science that the requirements are based on. We would recommend that references be included or an accompanying document with the information be produced. This would also assist in strengthening the validity of the code in the international arena.</p>	
1.1 Scope, page 4	3	<p>Often, scientific evaluations of what levels of pain an animal experiences when being slaughtered have been collected in an environment which has artificially heightened pain and anxiety levels in animals. When animals are killed in their own environment, without stunning, they are very relaxed and will die within seconds after having their throat cut.</p> <p>For these reasons, FF strongly recommended that rural butchers be exempt from this Code when operating in an on-farm capacity. It has been written for meat plants, and is impractical and unsafe for homekill operators to comply with it. Homekill operators work in a unique environment. The animals and operators' interests would be better served through education and through a Code which is written with the onfarm environment in mind.</p> <p>New Zealand is the only OECD nation whose agricultural industry remains successfully unsubsidised. Whereas farmers in other countries which impose very high production related standards on farmers have additional income streams than just the market, New Zealand farmers must remain economically viable or they will go out of business. When considering the affordability of standards imposed by codes such as this, it is therefore meaningless and unwise to make comparison between New Zealand farming practices and other countries.</p> <p>Federated Farmers and the New Zealand Rural Butchers Association [7] would welcome an opportunity to discuss this Code and our submission with NAWAC.</p>	<p>Disagree – NAWAC believes that it is appropriate to encompass all forms of commercial slaughter in the Code, and that the Code can satisfactorily accommodate the requirements of homekill operators. Section 10 of the draft code has been rewritten to provide clearer guidance for homekill service providers. Representatives of NAWAC met with Federated Farmers, NZ Rural Butchers Association and the NZ Pet Food Manufacturers Association to discuss their concerns. A new minimum standard has been added to clarify which minimum standards in the code specifically apply to homekill service providers.</p>

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1.1 Scope, page 4	4	Throughout the code there are a number of requirements that are different from other international standards such as the OIE guidelines. Recommends that NAWAC review this section of the code against those international standards and seek a level of consistency where this is possible.	Noted
1.1 Scope, page 5	4	The scope of the code is clearly defined as “from the point of unloading at slaughter premises to the time that they [the animals] are slaughtered”. There are a number of instances where minimum standards are stated that are outside this scope. Including requirements outside the scope of the code allows for inconsistencies when one code is changed (before the other is updated) and creates confusion for operators in locating all the requirements that they must meet.	Noted – section 4 has been removed from the code as recommended to the Minister and will now be covered in species-specific codes and the transport code.
1.1 Scope, page 4	8	The code mentions requirements for competency and experience in a number of places but this is not strictly defined. Is it correct to assume that this will be left to the operator to determine what is appropriate competence and experience for their operation or will this be further defined?	Noted – appropriate competence will be that which meets the minimum standards in this code. It will be up to the persons in charge of slaughter premises to ensure that staff have the appropriate competence to carry out their tasks.
1.1 Scope, page 4	9	<p>Asks for clarification on the application of this code to pet food slaughter where the animals are slaughtered on designated premises (as opposed to being slaughtered on farm and carcasses recovered). If commercial slaughter involves “the killing of animals to produce animal products where a business transaction takes place”, then it must include pet food slaughter houses as these do not seem then to be specifically excluded, although there is a later reference to slaughter “for human consumption” (although we are now told that pet food processing also has to be done to a standard for human consumption).</p> <p>There are an increasing number of dairy farmers that are sending their calves for pet food slaughter as young as 12–24 hours, and in some cases induced calves as well. The view is that as bobby calves the return is so small that the economics of maintaining those calves on the farm for 4 days is negative. These activities in theory should contravene this code (as they relate to selection of animals (MS 3(d)) but only provided the scope is correctly defined.</p>	Noted – designated premises for pet food slaughter are covered by this code. A statement that the code applies to pet food operators has been added to the scope. MS 3 has been deleted from the code and will now be covered in species-specific codes and the transport code.

1.1 Scope, last set of bullet points, page 4	14	Suggests “pre-slaughter handling facilities <u>and procedures</u> which minimise stress”.	Agree – change made.
1.1 Scope, page 4	11	Is pleased to see that the scope of the code covers all situations where commercial	Noted

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		slaughter is carried out, including by homekill service providers. The SPCA strongly believes that, where animals are to be slaughtered for commercial gain, they must be treated humanely, and effectively stunned prior to slaughter.	
1.10 Glossary, page 13	2	Supports the definitions as written except for “Stun – Render an animal insensible before causing death of the animal by any permitted method”. Feels the definition should read “Render an animal immediately insensible to pain before causing death of the animal by any permitted method”.	Disagree – but definition is now “Render an animal insensible. Includes the use of reversible methods (eg electrical) and irreversible methods (eg free bullet firearm).”
3 Competency	6	<p>Fully supports the focus on competency of staff, as a key element of ensuring the welfare of animals. The content of the draft code in its present form, however, includes substantial requirements for compliance, in terms of training, competency, and auditable quality systems – refer Minimum Standard No. 1 (Competency), Minimum Standard No. 2 (Competency of Stunning and Slaughter Personnel), and Minimum Standard No. 23 (Quality Assurance Programmes).</p> <p>Questions the current coverage, given the definition of “competent” as proficient in a specific task as demonstrated by having satisfied the requirements of any relevant qualification or possessing practical skills acquired by experience. Strongly recommends that the quality management programme recognise the importance of the role of supervision in commercial slaughter operation and training. The role of supervision is noted in the introduction to section 3, in Minimum Standard No. 2(d), but not at all in section 11. Supervision needs to be specifically covered in Minimum Standard No. 23(b)(i).</p>	Agree in part – supervision has been added to MS 23 with the addition of a new sub-clause: “training, competence and supervision of persons carrying out specified tasks”.

3 Competency, Minimum Standard No. 1, page 15	3, 7	Would appreciate clarification. In situations where an animal is to be slaughtered on-farm, we presume the farm manager is responsible for the care of the animals, rather than the homekill operator.	Noted – Section 10 of the code recommended to the Minister has been modified to provide further clarification on this point and includes a new minimum standard which excludes MS1 from applying to homekill service providers.
3 Competency, Minimum Standard No. 1, page 15	7	Would this include farms or lifestyle properties?	Noted – in the code as recommended to the Minister, MS 1 is not listed as a standard to be complied with by homekill service providers and pet food operators.

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3 Competency, Minimum Standard No. 1, page 15	9	What is “sufficient” and “appropriate”? This would be difficult to enforce unless an outcome is defined. The outcome is the maintenance of health and welfare of the animals – does that mean that if there is any compromise, then it can be ascribed to competency which is insufficient and inadequate?	Noted – NAWAC believes the minimum standard to be appropriate as written.
3 Competency, Minimum Standard No. 1, page 15	14	Suggests “Persons in charge of the premises must ensure that the animals <u>receive</u> care ...”	Disagree – NAWAC believes the minimum standard to be appropriate as written, although it now reads “...of the slaughter premises...”.
3 Competency, General Information, page 15	6	The inclusion of “Any contract or temporary staff should be trained and competent in the relevant activity” in our view sets a very low common denominator for defining training and competence unless the role of supervision is included.	Agree – statement has been deleted.

3.1 Competency of Stunning and Slaughter Personnel, Minimum Standard No. 2, page 15	3	<p>Recommends that this section be amended to read:</p> <p>(b) Operators must be:</p> <p>(i) experienced; or</p> <p>(ii) trained to carry out the stunning and bleeding procedures correctly, and trained in the method of applying the apparatus; or</p> <p>(iii) under the direct supervision of an experienced and competent operator.</p> <p>If that is agreed, then MS 2(d) may be deleted because it is no longer required.</p>	Agree in part – minimum standard has been rewritten.
3.1 Competency of Stunning and Slaughter Personnel, Minimum Standard No. 2, page 15	6	We believe that (a) and (d) as stated are contradictory.	Agree – minimum standard has been rewritten to address this point.
3.1 Competency of Stunning and Slaughter Personnel, Minimum Standard No. 2(a), page 15	3	Recommends that experience be recognised as a qualifier for competency.	Noted
3.1 Competency of Stunning and Slaughter Personnel, Minimum Standard No. 2(a),	7	Who decides who is competent and by what standard?	Noted – a competent operator would comply with the appropriate minimum standards contained in the code.

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page 15			
3.1 Competency of Stunning and Slaughter Personnel, Minimum Standard No. 2(a), page 15	18	Suggests that “slaughtered” be used instead of “killed” to ensure consistency in terminology. Please note that this was the subject of considerable discussion during the drafting of the code.	Disagree – definition of “slaughter” allows for “killing” to be used interchangeably with it.

3.1 Competency of Stunning and Slaughter Personnel, Minimum Standard No. 2(b), page 16	18	Suggests that correct training would include application of apparatus.	Noted
3.1 Competency of Stunning and Slaughter Personnel, Minimum Standard No. 2(c), page 16	14	Suggests an amendment to read "... and have an <u>effective action plan</u> to ensure that any animal which receives ...".	Disagree – NAWAC believes the minimum standard to be appropriate as written.
4 Selection of Animals for Slaughter, page 17	6	We are concerned with the content of this section. While we support the principle of animals being fit for slaughter, selection for slaughter is the responsibility of the farmer jointly with the transporter. The condition of animals arriving at the plant is the outcome of its condition at the point of loading and the journey.  We therefore believe that, apart from covering procuring animals for slaughter, this section should be advisory. We note that there are responsibilities on persons whose role it is to select animals for (transport to) slaughter.	Noted – section 4 has been deleted from the code. Points made in this section will now be covered in the transport code or in species specific codes.
4 Selection of Animals for Slaughter, page 17	18	We note that this text falls outside the scope of this code, ie "From point of unloading at slaughter premises to the time they are slaughtered". We recommend that there should be a section covering selection of animals for slaughter, but this may necessitate redefining the scope of this code or placing these requirements in a different code (such as the transport code).	Noted – section 4 has been deleted from the code. Points made in this section will now be covered in the transport code or in species specific codes.
4 Selection of Animals for Slaughter, Minimum Standard No. 3, page 17	3	We note that the eligibility for animals to be transported is currently covered in the Code of Recommendations and Minimum Standards for the Welfare of Animals Transported in New Zealand. The repetition of standards which are already covered in other Codes creates the potential for inconsistencies when Codes are updated at some future point. We strongly recommend that Codes do not duplicate each other.	Noted – section 4, including MS 3, has been deleted from the code. Points made in this section will now be covered in the transport code or in species specific codes.

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4 Selection of Animals for Slaughter, Minimum Standard No. 3, page 17	3	Homekill operators require an exemption from Minimum Standard No. 3 as animals not fit for transport are still acceptable for on-farm slaughter. For humane reasons under the Animal Welfare Act, animals may be slaughtered, regardless of whether they meet the criteria of Minimum Standard No. 3.	Noted – section 4, including MS 3, has been deleted from the code. Points made in this section will now be covered in the transport code or in species specific codes.
4 Selection of Animals for Slaughter, Minimum Standard No. 3, page 17	3	<p>We do not support Minimum Standard No. 3(a) and (b) and strongly recommend that (a) and (b) be amended. We suggest a definition of “abnormal behaviour” be included. “Abnormal behaviour” could be understood to mean restless, stressed, agitated or aggressive. Such behaviour can be a natural consequence of being herded, yarded and transported, therefore disqualifying a disproportionate number of animals from slaughter.</p> <p>We recognise that not all animals require transport in order to be slaughtered and that slaughtering diseased animals is not within the scope of this Code.</p> <p>We advise that animals suffering from diseases which are not highly contagious and which have little impact on their ability to be transported should not necessarily need a veterinary certificate to be selected for slaughter. An example is animals suspected of having Bovine Tb, Johne’s or facial eczema. Such a requirement may result in a conflict of regulations (eg Biosecurity (Bovine Tuberculosis – Cattle Levy) Order 1998).</p>	Noted – section 4, including MS 3, has been deleted from the code. Points made in this section will now be covered in the transport code or in species specific codes.
4 Selection of Animals for Slaughter, Minimum Standard No. 3, page 17	7	We advise that we slaughter many animals which if they could be yarded and transported would most definitely show abnormal behaviour but by killing in the paddock no such signs are exhibited. Animals with injuries or physical abnormalities can and are killed on farms by our members and the meat can be consumed by the animal owner if they so desire.	Noted – section 4, including MS 3, has been deleted from the code. Points made in this section will now be covered in the transport code or in species specific codes.
4 Selection of Animals for Slaughter, Minimum Standard No. 3(b), page 17	2	We contend that the word “accepted” should be replaced with “selected”. Using the word “select” makes it clear that the onus and responsibility occurs pre-transport and on-farm, rather than at the slaughter premises. This is also consistent with the title of Minimum Standard No. 3.	Noted – section 4, including MS 3, has been deleted from the code. Points made in this section will now be covered in the transport code or in species specific codes.
4 Selection of Animals for Slaughter, Minimum Standard No. 3(b), page 17	18	We remind you that there will be cases where animals need to be accepted for slaughter (or be humanely euthanased) at the slaughter establishment that may not be accompanied by a veterinary declaration – eg if the animal’s leg breaks during transport. This text appears to relate to on-farm selection. It would be helpful to	Noted – section 4, including MS 3, has been deleted from the code. Points made in this section will now be covered in the transport code or in species specific codes.

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		operators if guidance on the welfare requirements applicable within the scope of this code could be more clearly specified.	codes.
4 Selection of Animals for Slaughter, Minimum Standard No. 3(c), page 17	2	The requirement as originally worded specifies non-selection in the final two weeks of gestation. This is in conflict with the deer industry standard (DeerQA Programme), which states that deer must not be selected for transport to slaughter in the final three weeks of gestation.	Noted – section 4, including MS 3, has been deleted from the code. Points made in this section will now be covered in the transport code or in species specific codes.
4 Selection of Animals for Slaughter, Minimum Standard No. 3(c), page 17	9	<p>We note that concerns have been expressed about slaughter in the final two weeks of gestation, particularly in relation to cattle, as that time period is proportionately less of the gestation length (5% of cows, but 10% for sheep and goats). The key concern is to do with the stress of transport to the processing plant (possibly via saleyards).</p> <p>This means that for cattle it sits close to the normal variability of gestation length. Apart from this there is the matter of the accuracy of dating of pregnancies. Indeed, probably only about 30% of cattle are pregnancy tested at all, and unless the testing is carried out in the narrow window from 6 to 12 weeks of pregnancy, the age of the foetus cannot be assessed with a sufficiently high degree of accuracy to provide enough knowledge that the animal can be safely transported within such a fine margin. A further complexity is that, as later pregnant cows are perceived to be more valuable than earlier pregnant cows because of the value of foetal calf serum (there is anecdotal evidence that some farmers are exploiting this market by breeding their late cows to large breeds in the knowledge that they will be sent to slaughter and a larger calf will yield greater returns), the transport of the cull cow to the processing plant is likely to be delayed until the last possible stage. Given the variability that occurs, there needs to be better protection for the cows.</p> <p>We propose that Minimum Standard No. 3(c) is amended to “Cows in the final four weeks of gestation and other pregnant large mammals in the final two weeks of gestation must not be selected for transport to slaughter.”</p>	Noted – section 4, including MS 3, has been deleted from the code. Points made in this section will now be covered in the transport code or in species specific codes.



4 Selection of Animals for Slaughter, Minimum Standard No. 3(c) and (d), page 17	18	We recommend the deletion of Minimum Standard No. 3(c) and (d) because they are outside the scope and a farm and transport issue rather than a requirement that applies from the “point of unloading ...”. Including requirements that fall outside the defined scope of the code allows for inconsistencies when one code is changed before the other is updated and has the potential to create confusion for operators in locating all the requirements that they must meet.	Noted – section 4, including MS 3, has been deleted from the code. Points made in this section will now be covered in the transport code or in species specific codes.
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4 Selection of Animals for Slaughter, Minimum Standard No. 3(d), page 17	2	We advise that (d) appears to be relevant to bobby calves alone because no other newborns are transported. Hence, we recommend that the words “bobby calves” should be inserted.	Noted – section 4, including MS 3, has been deleted from the code. Points made in this section will now be covered in the transport code or in species specific codes.
5 Large Mammals, page 18	13	I suggest that “equines” in the first line be replaced with “horses”.	Disagree – equine includes, by definition in the glossary, a horse, pony, mule, ass, hinny and donkey.
5.1 Facilities, Introduction, page 18	14	I recommend that “factors to be considered” should include the sensitivity of the species to effects of food deprivation (ie monogastric – pigs, bobby calves – versus ruminants).	Disagree – this factor does not relate to the facilities but to the handling of animals in the facilities and, as such, is covered in the introduction to the next section: “The provision of feed during the pre-slaughter period will be dependent on the length of time until slaughter and the physiological requirements of the animals”.
5.1 Facilities, Introduction, page 18	14	I recommend that “factors to be considered” should include appropriate provision for resting animals (ie a suitable surface to allow comfortable resting in sternal recumbency, and sufficient space to do this).	Disagree – point is covered by MS 4(d).

5.1 Facilities, Minimum Standard No. 4, page 18	3	We ask that rural butchers be exempted from Minimum Standard No. 4 when operating in an on-farm capacity.	Agree in part – section 10 of the code recommended to the Minister includes a new minimum standard which excludes some parts of MS 4 from applying to homekill service providers.
5.1 Facilities, Minimum Standard No. 4, page 18	7	We ask whether a paddock fits under Minimum Standard No. 4 because it would have none of the features mentioned here.	Noted – section 10 of the code recommended to the Minister includes a new minimum standard which excludes some parts of MS 4 from applying to homekill service providers.
5.1 Facilities, Minimum Standard No. 4(c), page 19	18	We recommend that this be redrafted to more clearly specify the outcome being sought. This is also consistent with requirement for birds (Minimum Standard No. 13.)	Disagree – NAWAC believes the minimum standard to be appropriate as written.

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		<del>“The lairage must provide adequate shelter from adverse weather conditions and ventilation to protect the welfare of the animals being held for slaughter. Animals must be protected from weather conditions that adversely affect their welfare while they are awaiting slaughter.”</del>	
5.1 Facilities, Minimum Standard No. 4(d), page 18	14	I suggest that this should be amended to read “... <u>must provide space and suitable floor surfaces</u> for all animals to move freely, stand up and lie down.”	Disagree – NAWAC believes the minimum standard to be appropriate as written although it has been amended by the deletion of “excluding races”.
5.1 Facilities, Minimum Standard No. 4(d), page 18	2, 18, 9	We consider that the words “excluding races” need to be removed because, if included, they could be read as meaning that animals can be held in races without access to water and with no freedom to move. This was supported in the MIA submission. Similarly, the NZVA note that makes it sound as if it would be okay to hold animals in a race for 4 hours.	Agree – “excluding races” has been deleted.

5.1 Facilities, Minimum Standard No. 4(f), page 18	18	We recommend that this should be rewritten to give clarity to the word “safe”. “ <u>The design and slope of ramps must be designed such as to minimise animals becoming distressed, injured or and skidding. The slope must be safe for the animals using the ramp.</u> ”	Agree – minimum standard has been rewritten.
5.1 Facilities, Minimum Standard No. 4(g), page 18	2	We recommend that this should be worded as above so that it is outcome-based. This removes the need to use terms such as “regular cleaning” which in this context are not sufficiently definitive.	Agree – minimum standard has been rewritten.
5.1 Facilities, Minimum Standard No. 4(g), page 18	3, 7	We would appreciate clarification on (g), by providing guidance on what constitutes “regular cleaning” and what condition drinking water must be in to qualify as “fresh” in addition to “clean”. We also recommend an exemption be applied to homekill operators, as animals being slaughtered on-farm are not yarded long enough for clean, fresh drinking water to be a necessity. Federated Farmers considers that a time frame might also help to clarify this standard. It is a reality that at times farm animals are required go without access to water for a certain period (eg when being transported, being emptied out prior to shearing). In some cases there are health and safety reasons why it is necessary for animals to have restricted access to water, such as prior to shearing. The important outcome is that this period does not extend past the recommended number of hours after which lack of water might cause metabolic problems and/or precipitate clinical diseases.	Agree in part – minimum standard has been reworded to be more outcome focussed. Minimum standard now refers to water as being “palatable” – reference to “fresh” has been deleted, as has the reference to “regular cleaning”.  Section 10 of the code recommended to the Minister includes a new minimum standard which excludes some parts of MS 4 from applying to homekill service providers.

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5.1 Facilities, Minimum Standard No. 4(g), page 18	9	We recommend the removal of “held” because when does “holding” begin? – surely just all animals?	Agree – change made.
5.1 Facilities, Minimum Standard No. 4(g), page 18	14	I suggest “All animals must be able to <u>gain</u> access ...”. It is very common to see sheep so tightly crowded in lairage pens that they have no hope of reaching side- or corner-mounted water troughs.	Disagree – NAWAC believes the minimum standard to be appropriate as written although it has been reworded to be more outcome focussed.

5.1 Facilities, Minimum Standard No. 4(g), page 18	18	We recommend the deletion of the word “fresh” as this is not defined. We advise that a definition of clean drinking water is located in the NZFSA series of standards and provides an objective reference for measuring this outcome.	Agree – “fresh” deleted. Minimum standard now refers to water as being “palatable”.
5.1 Facilities, Minimum Standard No. 4(h), page 18	9	We note that concerns have been expressed about the process of swim washing, both from an animal welfare and from a hygiene perspective where it would appear it can actually contaminate rather than clean. We would like to see this replaced with other cleaning systems.	Noted –specific information on washing has been added to the general information in the next section on handling. See also reference to washing in NAWAC’s report to the Minister which accompanies the draft code.
5.1 Facilities, Recommended Best Practice, page 20	14	I suggest adding “Animal movement should be observed to identify and resolve problems causing stock to baulk or become injured.”	Disagree – NAWAC believes the RBPs to be appropriate as written, and that MS 3 adequately covers the issue.
5.1 Facilities, Recommended Best Practice, 1st para, page 20	2	“The maximum incline should not exceed 20° for all animals, except for bobby calves, where slopes should not exceed 12°.”  We believe that compliance with this requirement would at present be a problem for a considerable number of slaughter premises (including some deer slaughter premises) particularly when off-loading animals from the top deck of two deck crates. We would be interested to know the basis on which this maximum incline has been set, and also whether any other industry sectors have identified this as a potential problem.	Noted – this is a RBP and not a minimum standard which must be met.
5.1 Facilities, Recommended Best Practice, 1st para, page 20	9	We recommend that the maximum slope for ramps (20° with 12° for bobby calves) should be minimum standards.	Disagree – NAWAC believes that this is appropriate as a RBP.
5.1 Facilities,	18	We suggest deleting “The width of the ramp should be at least as wide as the exit	Disagree – although RBP has been

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Recommended Best Practice, 2nd para, page 20		door of the transport vehicle.” The ramps at the exit door of transport vehicles should have sufficient width for the animal to walk freely up or down without being restricted in their movement. This would allow for vehicles with wide access doors.	reworded.

5.1 Facilities, Ramps, page 20	2	We believe the sentence “In the case of pigs ...” should be rewritten so that it is applicable to all species. We suggest that it should read “Water should not be applied to any ramp to assist unloading”. This removes the idea that water used in this manner is only detrimental to pigs.	Agree – the reference to pigs has been deleted so that the information now applies to all animals.
5.1 Facilities, Ramps, page 20	6	We fully support this recommended best practice of non-slip ramps for pigs. However, we point out that water should not be applied to ramps to allow them to function as a chute, regardless of species.	Agree – this is, in fact, general information and not a RBP. The reference to pigs has been deleted so that the information now applies to all animals.
5.1 Facilities, Ramps, page 20	13	I note that there is no mention of the moving ramps that drop the sheep into the swim washes. I suggest that the following be added to Minimum Standard No. 4: “Moving ramps leading to swim washes must have no protruding parts that might catch and drag fleeces, they must be designed so that sheep cannot be injured on the wall of the wash race if they attempt to jump off the ramp, and they must be well supervised at all times when in operation.”	Disagree – NAWAC believes the minimum standard as written, along with the following minimum standard on handling, adequately cover this issue.
5.1 Facilities, Floors, page 20	9	If gratings are used, they must be appropriate – most animals in lairage come from pasture-based systems and have little or no experience of grating floors. Holding them on poorly designed floors will not only be a means of injury, but also of stress through unwillingness to lie down during the pre-slaughter period.	Noted – NAWAC believes the code, as written, adequately covers this issue.
5.1 Facilities, Floors, page 20	14	I suggest adding “Gratings should be designed to prevent injury or discomfort to stock”. Stock from soft or muddy pasture can have very soft feet which have often already been subjected to steel gratings during transport.	Disagree – although information has been changed to read “... appropriate design <u>for the species</u> ...”. NAWAC believes the information as written adequately covers the issue.
5.2 Handling, Introduction, page 21	3	Section 5 becomes unworkable when taking into consideration a requirement for adequate rest extends the time from yarding to slaughter. Yarding the animals, allowing time for them to empty, be loaded onto a truck, transported for several hours, unloaded, washed, and rested before being slaughtered at a facility which has a same-day slaughter policy would be highly impractical.	Disagree – NAWAC believes this section of the code, as written, to be practical in terms of the operation of slaughter premises.

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5.2 Handling, Introduction, 1st para, page 21	13	I recommend that this be altered to read “Minimising stress during pre-slaughter lairage will facilitate handling, and improve handler safety, animal welfare and meat quality. ... physiology, and this may <u>precipitate</u> clinical disease such as salmonellosis and metabolic disease in lairage”.	Agree in part – “exacerbate” changed to “precipitate”.
5.2 Handling, Introduction, 2nd para, page 21	9	We note that this contains three minimum standards.	Agree – paragraph has been rewritten to address this.
5.2 Handling, Introduction, 4th para, page 21	2	We believe that reference to water should be removed from this section: “Access to feed during the pre-slaughter ...”. Access to water is addressed in the Facilities section. Provision of water should not be governed by time to slaughter and the physiological requirement of the animals. As per Minimum Standard No. 4(g) “All animals held must have access to clean, fresh drinking water sufficient for each species’ needs”.	Agree – change made.
5.2 Handling, Introduction, 4th para, page 21	13	I suggest that this paragraph is meaningless unless specific recommendations are made, and that it would be good to add these for pigs and unweaned animals.	Disagree – the following minimum standard provides that animals must be fed maintenance rations if held for longer than the stated periods.
5.2 Handling, Minimum Standard No. 5(a), page 21	13	I recommend “Animals must be handled and moved <u>quietly and calmly at all times.</u> ”	Disagree – NAWAC believes the minimum standard to be appropriate as written.
5.2 Handling, Minimum Standard No. 5(c), page 21	2	We recommend that this should be reworded as above clarifying the intent:  (c) Where two or more groups of animals have been mixed they must be observed on mixing until settled for signs of injury, aggression or stress so that remedial action can be taken.	Agree in part – this standard has been deleted from the code and a new RBP added covering the mixing of different groups of animals. NAWAC notes that, in any case, MS 5(e) covers the situation where aggression occurs.
5.2 Handling, Minimum Standard No. 5(c), page 21	3	We note that the wording of this standard implies prior knowledge of an event that has not yet occurred and is unrealistic. We recommend that it be removed or at least amended. It is unclear what constitutes “groups” and “mixing” and, given that no one can accurately predict the behaviour of animals towards each other correctly on every occasion, this is unsuitable as a legally enforceable Minimum Standard.	Agree – this standard has been deleted from the code and a new RBP added covering the mixing of different groups of animals. NAWAC notes that, in any case, MS 5(e) covers the situation where aggression occurs.

5.2 Handling, Minimum	6	We support the principle expressed in Minimum Standard No. 5(c). However, in	Agree – this standard has been deleted
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<b>CODE SEC OR MIN STD</b>	<b>SUB REF</b>	<b>SUBMISSION</b>	<b>NAWAC RESPONSE</b>
Standard No. 5(c), page 21		practice there may be unavoidable exceptions. The New Zealand Pork Industry's quality system PQIP (Pork Quality Improvement Process) covers this point as: "If on rare occasions (eg Christmas) a number of small groups are submitted for slaughter then all practical steps must be taken to maintain separation of social groups."	from the code and a new RBP added covering the mixing of different groups of animals. NAWAC notes that, in any case, MS 5(e) covers the situation where aggression occurs.
5.2 Handling, Minimum Standard No. 5(d), page 21	2	We request the removal of the words "including deer with hard antler" as deer in hard antler are not ever sent to slaughter.	Agree – change made.
5.2 Handling, Minimum Standard No. 5(e), page 21	13	I note that feral goats under stress can be very aggressive to one another and since there is no practical way of segregating them in lairage they must be slaughtered promptly.	Noted – point covered by the minimum standard.

<p>5.2 Handling, Minimum Standard No. 5(f), page 21</p>	<p>3</p>	<p>We note that the term “horned cattle” is not defined in the Code. We consider that as long as horned cattle are managed appropriately, there is no reason for their selection for slaughter to be regarded as an animal welfare issue. Minimum Standard No. 5(c) and (d) sufficiently address the risk of horned animals injuring other animals.</p> <p>We consider that this minimum standard is impractical, unrealistic and has potential to cause considerable stress and injury to the animal due to the implied requirement for de-horning of horned cattle prior to slaughter. From an animal welfare perspective, this is a far less appealing alternative. Regardless of the use of anaesthesia, such an operation on an adult bovine would cause considerable pain, stress and bruising. If the horn holes extended into the sinus, the animal would suffer extreme pain if the anaesthesia wore off before the animal was transported and slaughtered.</p> <p>Suppliers would not want to see the quality of their cattle degraded by exposing them to stress and bruising by undergoing a dehorning operation. It has a considerable negative effect on their meat quality as stress produces acid and toughens the meat, and bruised meat has no value.</p> <p>The transport of horned cattle is best left to the discretion of experienced farmers and animal handlers. Stock trucks are designed to minimise the risk of animals hurting themselves and other animals.</p> <p>We strongly recommend the removal of this requirement.</p>	<p>Agree – minimum standard has been deleted.</p>
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<p>5.2 Handling, Minimum Standard No. 5(f), page 21</p>	<p>5</p>	<p>We suggested that this be deleted because it is covered adequately by Minimum Standard No. 5(d).</p>	<p>Agree – minimum standard has been deleted.</p>



5.2 Handling, Minimum Standard No. 5(f), page 21	5	<p>We note that keeping of horned cattle on farms is common practice in NZ. Dehorning adult cattle on the farm prior to transport is likely to be stressful and/or painful and could result in significant stress and blood loss prior to transport to slaughter. If the minimum standard remains then a definition of “horned cattle” is required. The practice of tipping is common and may result in short blunt horns or long horns with sharp points removed.</p> <p>Current practice and standards allow the Veterinary Technical Supervisor to take action if suffering occurs as a result of injury from or to horns. In some mobs of cattle the presence of horns does not result in significant injury or damage to carcasses.</p> <p>Should NAWAC wish to regulate the presence of horns on cattle to minimise injury during handling and transport then it is suggested that the appropriate place for this would be in the welfare codes relating to transport, and in species codes (ie dairy cows, beef cattle).</p>	Agree – minimum standard has been deleted.
5.2 Handling, Minimum Standard No. 5(f), page 21	7	We are concerned to see this statement included because horned cattle are not a problem for us. Killing facilities on premises or places have small yards so that each animal owner’s animal is identified and kept separate at all times. On the farm, in a paddock, it is not a problem at all.	Noted – minimum standard has been deleted.
5.2 Handling, Minimum Standard No. 5(g), page 21	3	We note that six hours seems a long time before assessment. We understand that this may be necessary to cover animals arriving during the night but suggest this be elucidated in the code and a lesser interval be set for daylight hours. What is “appropriate treatment” for injured, abnormal or diseased animals? Perhaps this could be elucidated in the general information. This also applies to Minimum Standard No. 5(k) in terms of “protecting welfare”.	Agree in part – minimum standard has been amended to “as soon as possible, but within 8 hours of arrival at the slaughter premises”.
5.2 Handling, Minimum Standard No. 5(g), page 21	18	We recommend deletion of “6 hours of”. We are not aware of any basis for 6 hours and would appreciate further guidance on the animal welfare outcomes being sought.	Agree in part – minimum standard has been amended to “as soon as possible, but within 8 hours of arrival at the slaughter premises”.
5.2 Handling, Minimum Standard No. 5(h),	13	I note that “indicates” should replace “indicate”.	Agree – change made.

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page 22			
5.2 Handling, Minimum Standard No. 5(j), page 22	14	I note that this should read an humane.	Disagree – wording okay as is.
5.2 Handling, Minimum Standard No. 5(k), page 22	13	I note that the last paragraph of General Information on p 24 is not clear, and that it be rewritten and Minimum Standard No. 5(k) rewritten as follows: “If an animal is born in the yards, it must either be killed humanely or taken away immediately for feeding and hand-rearing.”	Agree in part – the second sentence of the general information has been deleted. The minimum standard remains unchanged.
5.2 Handling, Minimum Standard No. 5(k), page 22	14	I suggest that guidelines should be given as to what steps need to be taken to protect the welfare of the dam and offspring.	Disagree – the suggested addition provides significant detail of a nature which NAWAC believes should not be included in the code.
5.2 Handling, Minimum Standard No. 5(l), page 22	6	We support the principle expressed but, as expressed, this minimum standard has no substance.	Agree – minimum standard deleted.
5.2 Handling, Minimum Standard No. 5(m)(i), page 22	4	We advise that this is a significant issue for the industry as changes are made to the traditional collection and processing times for bobby calves. In addition, scheduling bobby calves before other animals the following morning may create hygiene issues within the premises. We suggest within 24 hours of arrival as a suitable maximum time, allowing late arrival calves to be slaughtered at the end of the next processing day.	Agree in part – NAWAC has determined that bobby calves must be slaughtered as soon as possible but within 28 hours of being loaded for transport unless fed.
5.2 Handling, Minimum Standard No. 5(m)(i), page 22	9	We note that this means that bobby calves that have left the farm early the previous morning (and presumably were fed just before transport) may in some circumstances have 24+ hours from the time of their last feed until slaughter. Given that they have undergone the stress of transport and the hypoglycaemia that is induced by that, this is a bare minimum of acceptability. It is recommended that the second sentence of (i) be deleted.	Disagree – NAWAC has determined that bobby calves must be slaughtered as soon as possible but within 28 hours of being loaded for transport unless fed. NAWAC believes the minimum standards within the code will adequately protect their welfare while they await slaughter.

5.2 Handling, Minimum Standard No. 5(m)(i), page 22	11	We are pleased that Minimum Standard No. 5(m) states that bobby calves must be scheduled for slaughter on the day of arrival and that, if it is necessary to hold bobby calves overnight in rare circumstances, they must be killed the following morning. We believe that this should also apply to any milk lambs scheduled for	Agree in part – milk lambs have been included with bobby calves although NAWAC has determined that bobby calves must be slaughtered as soon as
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		slaughter at commercial premises. We therefore submit that Minimum Standard No. 5(m)(i) be amended to read “Bobby calves and milk lambs ...”.	possible but within 28 hours of being loaded for transport unless fed. NAWAC believes the minimum standards within the code will adequately protect their welfare while they await slaughter.
5.2 Handling, Minimum Standard No. 5(m)(i), page 22	13	I note that AWAC’s 1999 Annual Report states on p 21 under 11.2.8: “The bobby calf trade poses important welfare risks because it may be prolonged and involves three phases during which the calves may become hungry, cold and distressed – the farm, during transportation and in the meat works yards ... The required outcome [of research] is improved welfare for the calves and better quality product preferably without reducing profits. Careful co-ordination of all three phases is essential to achieve this”. This principle should be clearly outlined in the Code.	Disagree NAWAC has determined that bobby calves must be slaughtered as soon as possible but within 28 hours of being loaded for transport unless fed. Codes covering dairy cattle and the transport of animals will include maximum time limits for getting bobby calves to slaughter from their last feed. NAWAC believes the minimum standards within the code will adequately protect their welfare while they await slaughter.

5.2 Handling, Minimum Standard No. 5(m)(i), page 22	13	<p>I believe that the current common practice of holding bobby calves overnight in sheep pens is not acceptable. Sheep pens are noisy and draughty. Calves that are already hungry and cold require quiet well-sheltered accommodation.</p> <p>They should be killed within 24 hours of receiving their last feed. If this is too impractical to be included as a standard, then they must be killed on the day of arrival. I really do not believe that NAWAC should condone the practice of sending bobby calves to distant works involving such long journeys that they have to be held overnight.</p> <p>I suggest that Minimum Standard No. 5(m)(i) be altered to read:</p> <p>“Bobby calves must be scheduled for slaughter on the day of arrival at <u>the meat works</u>.”</p> <p>(Delete “If it is necessary ... killed the following morning” as in practice this can mean waiting until after the sheep kill the following day, ie until midday or later.)</p>	Disagree – NAWAC has determined that bobby calves must be slaughtered as soon as possible but within 28 hours of being loaded for transport unless fed. NAWAC believes the minimum standards within the code will adequately protect their welfare while they await slaughter.
5.2 Handling, Minimum Standard No. 5(m)(i), page 22	14	I suggest “Then they must be given first priority in the killing order the following morning”. Otherwise they could be left until 11.55 am!	Disagree – NAWAC has determined that bobby calves must be slaughtered as soon as possible but within 28 hours of

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			being loaded for transport unless fed. NAWAC believes the minimum standards within the code will adequately protect their welfare while they await slaughter.

5.2 Handling, Minimum Standard No. 5(m)(i), page 22	18	<p>We note that the specificity of the requirement for bobby calves to be “scheduled for slaughter on the day of arrival at premises ... [or] killed the following morning” creates logistical and food safety issues for the industry.</p> <p>Scheduling bobby calves for slaughter prior to other animals the following morning is likely to create significant hygiene issues within the premises (calves are known to carry higher levels of verotoxigenic E. coli and other pathogenic enteric bacteria than, for example, sheep and lambs which are processed on the same slaughter line). To avoid cross-contamination our establishments routinely require that bobby calves be slaughtered after other species of stock. (This is the clause that we received the most submissions on from our members.)</p> <p>The welfare of young animals such as calves is paramount; however, we contend that welfare could be protected if the text could be altered to specify the outcomes being sought.</p> <p>We therefore recommend that Minimum Standard No. 5(m) be altered to read “Animals must not be held in yards for periods that cause undue stress”, with a best practice recommendation that bobby calves should not be held for more than 24 hours after arrival.</p>	Agree in part – NAWAC has determined that bobby calves must be slaughtered as soon as possible but within 28 hours of being loaded for transport unless fed.
5.2 Handling, Minimum Standard No. 5(m)(i), page 22	18	We understands that this is an EU market access requirement. We submit that including market access requirements within a New Zealand specific code restricts trade to other markets.	Disagree – the minimum standards have nothing to do with EU market access requirements but are solely concerned with the welfare of animals being commercially slaughtered in New Zealand. In any case, NAWAC has determined that bobby calves must be slaughtered as soon as possible but within 28 hours of being loaded for transport unless fed.
5.2 Handling, Minimum Standard No. 5(m)(ii),	13	This is incompatible with Minimum Standard No. 5(n) unless food is supplied in lairage. If the intention is to direct managers to feed stock in the yards when they	Disagree – the intention is for feed to be supplied in lairage if required. NAWAC

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page 22		are held for unusually long periods then maybe this could be spelled out.	believes the minimum standard is clear as written.

5.2 Handling, Minimum Standard No. 5(m)(ii), page 22	18	We recommend that this requirement become a Best Practice guideline as, arguably, 1 minute beyond the set time frame could result in a legally defensible noncompliance.	Disagree – NAWAC believes that the minimum standard is appropriate as written.
5.2 Handling, Minimum Standard No. 5(n), page 22	9	This interval is too long because animals will undoubtedly have been yarded and trucked over a period of 8–12 hours before they reach the plant. This could mean animals may have 48 hours without food and unweaned calves and lambs may have 36 hours.	Disagree – while the code does not provide total maximum times off feed, however, the species-specific codes and transport code will also each contain maximum times. Taken together, these times will be within the welfare parameters defined in scientific research.
5.2 Handling, Minimum Standard No. 5(n), page 22	9, 13	Could be left as a recommendation and Minimum Standard No. 5(n) altered to read: “The time spent in lairage should be as short as possible in an attempt to comply with the maximum fasting times for the species or class of stock (ie no more than 24 hours for horses, pigs; 12 hours for unweaned calves and lambs; and 36 hours for sheep and cattle).”	Disagree – NAWAC believes the minimum standard to be appropriate as written, although it has been reworded.
5.2 Handling, Minimum Standard No. 5(n), page 22	13	This is meaningless as it is written. It does not take into account the time spent in yards on the farm and transport time.	Disagree – while the code does not provide total maximum times off feed, the species-specific codes and transport code will also each contain maximum times. Taken together, these times will be within the welfare parameters defined in scientific research.
5.2 Handling, Minimum Standard No. 5(n), page 22	14	These times should be shortened in recognition of the fact that most stock will be yarded on the farm for several hours, transported for several hours, and some will go to saleyards before slaughter. There should be a maximum <i>total time</i> allowable off water and food.	Agree in part – times have been shortened. The code does not provide total maximum times off feed, however, the species-specific codes and transport code will also each contain maximum times. Taken together, these times will be within the welfare parameters defined in scientific research. The code provides that animals must have access to water at

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			all times.
5.2 Handling, Minimum Standard No. 5(n), page 22	18	We again recommend that this requirement become a Best Practice guideline as, arguably, 1 minute beyond the set time frame could result in a legally defensible non-compliance.	Disagree – NAWAC believes that the minimum standard is appropriate as written, although it has been reworded.
5.2 Handling, Minimum Standard No. 5(n), page 22	18	We recommend that “Goats and deer – 24 hours” also be included for completeness as the scope of the code covers these animals also. Similarly, we recommend that “lambs” be included for completeness, even though the term “sheep” is allembicing.	Agree in part – goats and deer have been included at a maximum of 36 hours.
5.2 Handling, Minimum Standard No. 5(p), page 22	9	If a cow arrives with a distended udder, then she should be slaughtered within 12 hours unless milked. If she arrives with a distended udder then it likely that she is already 12 hours since milking, and so in some discomfort. Extending it by a further 24 hours is too much.	Disagree – NAWAC believes that the minimum standard is appropriate as written
5.2 Handling, Minimum Standard No. 5(p), page 22	13	Should be revised to read: “Lactating cows with distended udders must be slaughtered or milked as soon as possible and within 12 hours of arrival.”	Disagree – NAWAC believes that the minimum standard is appropriate as written
5.2 Handling, Minimum Standard No. 5(p), page 22	14	24 hours seems a very long time if the udder is already noticeably distended. It could be close to bursting at the time of arrival.	Disagree – NAWAC believes that the minimum standard is appropriate as written
5.2 Handling, Minimum Standard No. 5(r), page 23	2	Replacing the word “control” would clarify the extent of management a dog needs on premises. We recommend that the standard read “Dogs must be under the supervision of a handler at all times”.	Disagree – NAWAC believes that the minimum standard is appropriate as written.
5.2 Handling, Minimum Standard No. 5(r), page 23	13	The use of dogs in lairage causes sheep considerable distress. There should be a recommendation that dogs be used as little as possible, and wherever possible the use of dogs should be phased out.	Disagree – NAWAC believes that the minimum standard is appropriate as written.
5.2 Handling, Minimum Standard No. 5(s), page 23	2	Dogs have been shown to cause additional distress to sheep in lairage. Their use should be strongly discouraged. Many slaughter plants manage to get by without them.	Noted – NAWAC believes that the minimum standard is appropriate as written, although goats and pigs have now been included.

5.2 Handling, Minimum Standard No. 5(s), page 23	13, 9	Dogs must not be used on goats or pigs.	Agree – minimum standard changed.
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5.2 Handling, Minimum Standard No. 5(t), page 23	13	This is meaningless unless the supervisors are required not just to be there but to act to prevent swim washing and high pressure spray washing of weak or very thin stock.	Agree in part – minimum standard has been modified to read “All swim washing and high-pressure or highvolume spray washing must be closely monitored at all times to ensure the welfare of the animals”.



5.2 Handling, Minimum Standard No. 5(u), page 23	2	<p>We note that there is no mention of minimising the actual number of sheep that are swim washed (frequency as used here seems to imply the frequency per individual). Some plants routinely swim wash all stock. In these plants stock can be delivered very clean (especially lambs and hoggets) yet are plunged into very dirty looking water as a routine part of entering the plant. Swim washing is stressful and should not be used unnecessarily.</p> <p>Because washing is stressful and associated with bacterial contamination of the carcass, perhaps NAWAC could consider supporting research on alternative techniques to ante-mortem washing which achieve hygienic carcasses (eg postmortem washing/shearing of critical areas, or farmer incentives to present clean stock – eg charging for washing).</p> <p>Attention should also be given to high pressure washing systems which are commonly used on cattle and deer just prior to slaughter. The animals are often tightly packed into the high pressure washing area and unable to avoid strong jets of water in sensitive areas such as eyes and ears. If detergents are used these could be irritating too.</p> <p>In cold weather, the benefits of showering to calm and cool recently arrived stock need to be weighed against the risk of cold discomfort and distress during subsequent (especially overnight) lairage. It is common practice in deer plants to use overhead sprays extensively. In one plant all deer were sprayed continuously from afternoon arrival until slaughter the next day. In the winter it could be extremely cold. There may be other effects on deer of this prolonged showering with cold water.</p>	Noted – NAWAC is concerned about the welfare implications of washing animals and has included a specific section on it in the general information.
5.2 Handling, Minimum Standard No. 5(u), page 23	11	We have major concerns over the considerable distress caused to stock through repeated swim washing. We submit that, with proper management, there should be no need to swim wash stock more than once, if at all. We believe that it is inhumane to swim wash stock more than once prior to slaughter, and that this needs to be clearly stated in addition to Minimum Standard No. 5(u).	Agree in part –minimum standard has been added that animals must not be swim washed more than twice.

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		We therefore submit that a new minimum standard be added to read: “Animals must not be swim washed more than once in the pre-slaughter period.”	

<p>5.2 Handling, Minimum Standard No. 5(u), page 23</p>	<p>13</p>	<p>I note that the welfare issues relating to swim washing of sheep do not reflect the views of AWAC as expressed in an article in MAF’s Food Focus (Issue 10, November 1998):</p> <p>“Swim washing of sheep before slaughter should be phased out according to AWAC ... The Committee’s findings are largely based on a 1996 survey by MAF Quality Management. The survey found 62% of plants swim wash most sheep at least once often in combination with spray washing. Multiple washes were common at some plants. The Committee believes the practice is stressful for sheep (even more so for goats), and has an adverse effect on the quality of meat as measured by ultimate pH. In addition, pre-slaughter stress may actually increase the levels of bacteria excreted by sheep. Swim washing is particularly stressful if animals are cold, in weak condition or have been held off feed for a long period.”</p> <p>The article points out that research (Biss and Hathaway, NZVetJ 46, pp 167–172, 1999) has shown that visual contamination is not a reliable guide to the microbial load on a lamb carcass and that swim washing actually increased the microbial load. This Food Focus article was provided by the AWAC and written by [authors named].</p> <p>An AWAC document that would be useful in redrafting this Code is AWAC 149/96 (Swim washing of Sheep and Goats). I recommended that the writing group consult this document. It may also be possible for the writing group to obtain a copy of the MAF Quality Management survey (1996/97) of swim washing practices in lairages.</p> <p>I suggest that Minimum Standard No. 5(u) be deleted as it is too vague and impossible to police. The following could be added:</p> <ul style="list-style-type: none"> <li>• Sheep washing facilities must be designed and managed to minimise distress.</li> <li>• Sheep that are presented clean for slaughter must not be swim washed.</li> <li>• Sheep must not be swim washed more than once.</li> <li>• Sheep that are presented daggy or very dirty must be crutched in the yards or they must be returned to the farm of origin to be crutched. Swim washing is not an efficient way of cleaning them.</li> </ul>	<p>Agree in part – recommended documents were reviewed by NAWAC. Swim washing has been given special emphasis in the code as recommended to the Minister and in the accompanying report. A new minimum standard has been added that animals must not be swim washed more than twice. A specific section on washing has been added to general information.</p>
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		<ul style="list-style-type: none"> <li>• Full fleeced sheep must not be swim-washed.</li> <li>• Very thin sheep (such as emaciated cull ewes and thin tail end lambs with a body condition score &lt;2) must not be swim washed.</li> </ul>	
5.2 Handling, Minimum Standard No. 5(u), page 23	13	<p>AWAC had condemned the practice of swim washing of goats. Many of the goats in lairage are feral types and they are very susceptible to stress, and not just the stresses of cold and hunger but fear and anxiety too. There should be an appropriate minimum standard to this effect (not just a recommendation as on p 23 of the draft Code). I suggest deleting the recommendation at the bottom of p 23 and adding this minimum standard:</p> <p>“Goats must not be swim-washed.”</p>	Disagree – NAWAC believes the RBP is appropriate for this issue and does not support its addition as a minimum standard.
5.2 Handling, Minimum Standard No. 5(u), page 23	13	<p>On very cold winter days in Otago and Southland, sheep that are swim washed or sprayed are very likely to experience severe cold stress, especially if they are thin or recently shorn or if the washing is repeated. Significant numbers of shorn ewe deaths had occurred overnight in Southland lairages in winter. I recommend:</p> <p>“Recently shorn sheep (with &lt; 10 mm wool) must not be swim washed on very cold days (ambient temperature &lt; 5 degrees C).”</p>	Disagree – NAWAC does not support this addition as a minimum standard, but notes that the issue of climatic conditions is referred to in the general information provided on washing of animals.
5.2 Handling, Minimum Standard No. 5(u), page 23	13	<p>There are real welfare issues associated with cold water showering of cattle in winter in Otago and Southland. The recommendation (p 23) that cattle should not be left under a cold water shower for more than an hour doesn't take into account the fact that in very cold weather, this would inevitably cause cold stress in weak and thin stock, especially if the saturated cows have to stand in uncovered yards overnight.</p> <p>I suggest that the recommendation at the bottom of p 23 be deleted and minimum standards added along the following lines:</p> <ul style="list-style-type: none"> <li>• Cattle must not be subjected to cold water spraying for more than half an hour if the weather is very cold (&lt;10 degrees C).</li> <li>• Very thin cows (body condition score &lt;2.5) and weak cows must not be subjected to high pressure cold water spraying, or to prolonged cold water spraying.</li> </ul>	Disagree – NAWAC believes the RBP is appropriate for this issue and does not support its addition as a minimum standard.

5.2 Handling, Minimum Standard No. 5(u),	13	The welfare issues associated with the practice of using high pressure cold water sprays has not been addressed in the draft Code. I understand that in at least one meat works all cattle are subjected to a 10-minute wash in a brick tunnel with iron	Disagree – NAWAC believes that the minimum standard adequately addresses
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page 23		gates at either end on their way to the killing pen, and the wash is sometimes repeated. This occurs after the prolonged cold water sprays in the yards, and regardless of how frosty the morning is or how old or thin the cattle are (cull dairy cows).  I suggest that the following minimum standard be added:  “High pressure cold water hosing of cattle must not be carried out for more than 5 minutes and on no more than one occasion immediately before slaughter.”	the issue.
5.2 Handling, Minimum Standard No. 5(u), page 23	13	There may well be similar issues involved in pre-slaughter management of deer, pigs and horses, but I have not witnessed the management of these species in lairage. I urged the working group to include corresponding minimum standards relating to the procedures used to pacify and wash deer and if appropriate horses and pigs before slaughter.	Noted – NAWAC notes that the minimum standards in the code concerning washing apply to all animals and not just sheep.
5.2 Handling, Minimum Standard No. 5(w), page 23	2	We suggest a rewording to clarify the intent:  “When handling animals only the minimum force required must be used to minimise distress.”	Agree in part – minimum standard has been reworded for better clarity.
5.2 Handling, Minimum Standard No. 5(w), page 23	13	I suggest that it would be worth saying that undue force must not be used to push up the tail of cattle (commonly done to move them forward in a race). There have been instances in lairage when their tails were broken by a rough handler. I suggest an additional minimum standard:  “Undue force must not be used when pushing up the tail of cattle to move them forward in a race.”	Disagree – NAWAC believes that the minimum standard adequately addresses the issue.

5.2 Handling, Minimum Standard No. 5(x), page 23	6	We do not support the use of goads in ideal conditions. However, it must be recognised that conditions are not always ideal. Therefore, we prefer the approach in PQIP which states:  “Pigs should be moved with minimal force. If any aid is required, backing boards or canvas slappers should be used. (The canvas slappers should be used to make a noise not to hit the pigs.) If on rare occasions the recommended methods fail, electric prodders may be used by trained handlers, as sparingly as possible.”	Disagree – NAWAC believes that the minimum standard is appropriate as written.
5.2 Handling, Minimum Standard No. 5(x), page 23	11	We are concerned at the possible use of electric goads to move animals in situations where alternatives may be available, or where better design of facilities or improved stockmanship would prevent the situations arising in the first place. The SPCA believes that electric goads should only be available for use where the safety of the	Disagree – NAWAC believes that the minimum standard is appropriate as written.

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		handler is at risk.  The SPCA therefore submits that minimum standard 5(x) be amended to read:  “Electric goads must not be used to move animals other than where the safety of the handler is at risk.”	
5.2 Handling, Minimum Standard No. 5(z), page 23	3	We suggest an amendment because in cases where the slaughtering premises are a non-export abattoir, there will not be a full-time veterinary presence at the premises. This standard was transferred from the Industry Standard 4 which applies to export slaughter premises under the Animal Products Act:  “Animals which are injured, abnormal or otherwise unfit for transport must not be removed from the slaughtering place without having been assessed by <u>the official ante-mortem inspector at the premises</u> prior to the planned transport.”	Noted – however, the minimum standard has been rewritten and no longer allows transport of the applicable animals (except newborn animals) from the premises.
5.2 Handling, Recommended Best Practice, 1st para, page 23	3	I recommend that decisions for adequately resting animals prior to slaughter be left to the discretion of experienced animal handlers.	Noted

5.2 Handling, Recommended Best Practice, 1st para, page 23	3	For the purposes of clarity, we recommend that the wording of the first paragraph should be:  “Animals should be adequately rested prior to slaughter <u>to avoid mistaking injury, disease and physiological abnormalities for fatigue.</u> ”	Disagree – NAWAC believes that the RBP is appropriate as written.
5.2 Handling, Recommended Best Practice, 1st para, page 23	3	We would appreciate the provision of a definition for “physiological abnormality” and “adequately rested”.	Disagree – NAWAC believes that the RBP is appropriate as written and that no explanation is required.
5.2 Handling, Recommended Best Practice, page 23	13	I believe that the recommendations should be minimum standards:  2nd para – “Unweaned animals such as bobby calves and <u>unweaned</u> lambs, lactating animals and animals in advanced pregnancy <u>must</u> be slaughtered <u>as soon as possible and</u> on the day of arrival.” (Note “unweaned”, not “milk” lambs.)  3rd para – “... facilities should be designed ...” should be changed to “must” and become a minimum standard.  4th para – “Full fleeced sheep should not be swim-washed.” should be changed to “must” and become a minimum standard.	Disagree – NAWAC believes that the RBPs are appropriate as written and should not become minimum standards, however, the reference to the design of facilities has been deleted from the third paragraph as this is already effectively covered by MS 4(a). The reference to swim washing of full fleeced sheep has been rewritten to be outcome focussed.

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5.2 Handling, Recommended Best Practice, last para, page 24	3	We believe the muzzling of dogs is not always necessary or even best practice, and must be left to the discretion of the dog handler. Dogs could be muzzled if the dog handler considers there is a risk that they will bite other animals; however, this needs to be balanced against the welfare impacts on working dogs. Muzzles restrict panting and drinking ability, the dogs’ ability to protect themselves and increase the risk that dogs can become caught on objects.	Agree – reference to muzzling has been removed from the RBP, and discussion of the issues around muzzling has been added to the general information.
5.2 Handling, General Information, 4th para, page 24	2	The reference to “Stags with hard antler ...” should be removed, as this situation is not possible. Stags in hard antler are not offered or accepted for slaughter.	Agree – paragraph has been deleted.

5.2 Handling, Washing, 1st para, page 24	13	I suggest minor alterations as follows: “Washing <u>is</u> a major stressor in the preslaughter period and its use should be <u>minimised and</u> well managed. Sheep washing is commonly undertaken to improve meat hygiene, <u>although</u> research has shown that <u>swim</u> washing may lead to <u>increased microbial contamination of carcasses.</u> ”	Agree in part – section has been rewritten. Reference to increased microbial contamination of carcasses is made in the report to the Minister that accompanies the draft code.
5.2 Handling, Washing, page 24	13	I suggest exchanging the 3rd and 2nd paras and altering the 2nd para because it doesn’t make a lot of sense: “Some sheep arrive for slaughter in dirty or daggy condition or unshorn. Farmers should be encouraged to dag, crutch and shear as necessary on the farm and allow time for any skin wounds to heal before sending sheep to the works.”	Agree in part – section has been rewritten.
5.2 Handling, Washing, 1st para, page 24	18	Meat hygiene outcomes may be actually compromised by swim washing and thus including this statement by way of rationale is not recommended.	Agree – reference to meat hygiene outcomes has been deleted. Reference to increased microbial contamination of carcasses is made in the report to the Minister that accompanies the draft code.
5.2 Handling, Washing, page 24	18	We suggest deletion of part of the 1st para and all of the second and third paras because they are “outside the scope” of the Code.	Disagree – although this section has been rewritten.
5.3 Restraint for Stunning, Minimum Standard No. 6(a), page 25	3	This requirement is vague and does not explain how an animal should be presented in a manner that allows effective stunning. The desired outcome should be clarified or the minimum standard removed.	Disagree – NAWAC believes that the minimum standard is appropriate as written.
5.3 Restraint for Stunning, Minimum	14	For most livestock, isolation from the rest of the herd and restraint are extreme stressors. It should be emphasised that the <i>time spent</i> in isolation and restraint	Noted – NAWAC believes that the minimum standard is appropriate as

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Standard No. 6(c), page 25		should be minimised and that the facilities should be designed to minimise the experience of isolation.	written.

5.3 Restraint for Stunning, Minimum Standard No. 6(f), page 25	3	We support Minimum Standard No. 6(f) which provides for unrestrained cattle, deer and horses to be killed by homekill service providers using a firearm. However, we would also like to see the inclusion of other animals such as sheep, pigs, goats, ostriches and emus in order to retain the flexibility to deal appropriately with all situations which may arise on-farm.	Noted – these animals (except ostrich which is covered under the section on birds) are included by default, although wording of the standard has been changed to make this clear.
5.3 Restraint for Stunning, Minimum Standard No. 6(f), page 25	7	Should sheep, pigs, goats, ostrich and emus be included to cover the lifestyle block without any yards etc and to help them meet Minimum Standard No. 19?	Noted – these animals (except ostrich which is covered under the section on birds) are included by default, although wording of the standard has been changed to make this clear.
5.4 Stunning, page 26	3	In the interests of human health and safety, a clear exemption for stunning should be applied to homekill situations.	Disagree – NAWAC believes that all animals to be commercially slaughtered should be first stunned, including by a method that results in immediate insensibility and death. Refer to the report to the Minister which accompanies the draft code for a full explanation of NAWAC’s decision on this issue.
5.4 Stunning, page 26	14	In each case, the signs of a correct, effective stun and an incorrect stun must be made clear to the operator. In my experience, this seems to be an area where some doubt exists.	Noted – there is an appendix to the code which sets out the signs of an effective stun in farmed mammals.
5.4 Stunning, page 26	14	There should be information on how to deal with foetuses, especially those close to being born.	Agree – minimum standard and a RBP added concerning the handling of foetuses to the section covering bleeding out of large mammals.
5.4 Stunning, page 26	16	Electrical stunning has been employed for 20 years on the assumption that grand mal epileptiform activity in the brain indicates unconsciousness. However, if we are to recognise the primary functions of the sensory and motor nervous systems we see that such thinking is basically, scientifically untenable..	Noted – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC’s view on this issue.
5.4 Stunning,	12	Re the passage “Animals killed by this method are conscious and may experience	Disagree – refer to the report to the



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Introduction, 1st para, page 26		<p>pain or distress for several seconds or minutes prior to death. Therefore stock and farmed game must be rendered insensible to pain by an approved stunning method prior to commercial slaughter”.</p> <p>There is no scientific evidence that animals do experience pain or distress after severance of the main neck vessels. There is therefore no evidence that any stunning of animals is required prior to such a method of slaughter. With the sudden huge loss of circulating volume, rapid syncope would occur in humans, preceded by light-headedness but not pain. Hypovolaemic death in humans does not appear to be painful. Furthermore, there is no evidence that Shechita alone causes pain even in the absence of stunning.</p>	Minister that accompanies the draft code for a full explanation of NAWAC’s view on this issue.
5.4 Stunning, Introduction, 2nd para, page 26	12	<p>Re “Humane methods of stunning animals for commercial slaughter have been developed, including mechanical and electrical stunning”.</p> <p>Considering that stunning is not completely reliable and there is an approximately 9% miss rate, it is possible that in many cases, stunning may actually cause pain and distress rather than prevent it, especially where stunning is the only method of slaughter employed.</p>	Disagree – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC’s view on this issue.
5.4 Stunning, Minimum Standard No. 7, page 27	3	<p>We consider that it is important to retain the flexibility for farmers and homekill operators to be able to kill animals quickly and efficiently. This is particularly important where it is necessary to dispose of the animal as quickly as possible, such as in emergency situations.</p> <p>We recommend that the scope of the Code be limited to licensed and approved premises. Alternatively, we recommend that greater clarity be given to which sections of the Code do in fact apply to homekill service providers. We strongly recommend that in the interests of human health and safety, a clear exemption for stunning be applied to homekill situations.</p>	<p>Disagree – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC’s view on why stunning is to apply to homekill situations.</p> <p>A new minimum standard has been added to clarify which minimum standards in the code specifically apply to homekill service providers.</p>
5.4 Stunning, Minimum Standard No. 7, page 27	3	It is not practical for homekill operators to stun animals prior to slaughter, nor is it always safe to use a firearm. Until conclusive scientific evidence can be made available which proves that slitting the throat is more painful than stunning, many homekill operators will remain doubtful that a requirement for stunning animals (particularly sheep) is justified.	Noted – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC’s view on this issue.

5.4 Stunning, Minimum Standard No. 7, page 27	3	It is important that realistic and practical requirements are in place for rural butchers as perverse consequences may occur if rural butchers are not legally able to kill sheep in the traditional manner with a sharp knife. Animal owners, who have no	Noted – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC’s view on this
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		such restrictions on them, will still be permitted to kill the sheep with a knife (subject to requirements in the Animal Welfare Act 1999) and then hand the remaining tasks over to the rural butcher to complete. Experienced farmers will be sufficiently expert at cutting the throat of a sheep; however, life-style farmers may in some cases lack the skills to do this correctly and safely. In this case it would be perverse to require the rural butcher to stand by and observe while this task was carried out by someone lacking their experience and knowledge of animal welfare.	issue.
5.4 Stunning, Minimum Standard No. 7, page 27	3, 7	We believe that cutting the throat and spinal cord of an animal is far more humane than an ineffective electrical stun or bullet. Homekill operators do not use firearms on some animals (particularly sheep) as the shot may not be fatal, it can ruin the carcass, and there is a danger of unintentional injury to bystanders and other animals present nearby. Moreover, not all homekill operators own firearms, and when attending lifestyle blocks, the sound of a gunshot can upset the neighbours. Captive bolts are not practical on all lifestyle blocks as their use requires a restraining device.	Noted – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC’s view on this issue.
5.4 Stunning, Minimum Standard No. 7, page 27	7	We have a problem with this standard as it relates to the slaughter of sheep on the farm. We believe that our safety is paramount so we need to be able to slaughter sheep by the farmers’ traditional method in certain situations where the use of a firearm is likely to be unsafe.  We have heard all the arguments about this method causes pain for 3 seconds and when we read this code and see things written about animals recovering after electric stunning, swim washing and conveyors we really wonder what is actually the problem. Electric stunning must hurt and seems to not guarantee an effective kill each time whereas our method of killing sheep on the farm is 100% effective and safe for them and any bystanders and other animals present nearby.	Noted – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC’s view on this issue.

5.4 Stunning, Minimum Standard No. 7(c), page 27	11	<p>We are opposed to any method of commercial slaughter that does not involve the stunning of animals prior to slaughter, such methods of stunning to be capable of instantaneously rendering the animal insensible to pain until the animal is dead. We do not support any exceptions to this principle based on religious grounds. This was expressed by the SPCA in our submission on NAWAC's religious slaughter discussion paper.</p> <p>We therefore strongly submit that Minimum Standard No. 7(c), which allows for Shechita slaughter of goats, sheep, cattle and poultry without prior stunning, be deleted.</p>	Disagree – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC's view on this issue.
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5.4 Stunning, Minimum Standard No. 7(e), page 27	2	We believe the words "... working order and repair" should be removed. This section should be consistent with other minimum standards in the Code, eg Minimum Standard No. 9(k) which refer to being "in good condition in accordance with the manufacturer's recommendations".	Agree – change made.
5.4 Stunning, General Information, last para, page 28	9	This should be a recommended best practice.	Agree – change made.
5.4.1 Use of Captive Bolt, Minimum Standard No. 8(e), page 29	18	While a tolerance prior to action is appreciated, we recommend removal of the reference to 2% in this context as the measurement parameters are not included (eg each day, month, or year?) and premises will manage this requirement through their quality management system as required in section 11.	Agree in part – minimum standard has been removed as the issue is now covered by a new, all encompassing, standard in the section on stunning. This new standard does not include the 2% percent measurement, however, reference to this measurement is made in the general information which follows the minimum standard.

5.4.2 Electrical Stunning, Minimum Standard No. 9(d) and (f), page 30	3	We consider that scientific evidence must have been sought to prescribe the duration of a stun be at least 2 seconds and reach minimum prescribed currents. This is not apparent in the Code and no other justification has been given for raising the legal standard.	Noted – the minimum standard now reads “the correct current level must be attained within 1 second of the initiation of the stun and must be maintained for at least 1 – 3 seconds”. The minimum currents prescribed in MS 9(f) have been moved to general information and brought into line with OIE guidelines.
5.4.2 Electrical Stunning, Minimum Standard No. 9(d), page 30	2	The duration of the stun must be at least 2 seconds. The Venison Processors Industry Agreed Standard states 1 second minimum as opposed to 2. It is understood that the industry standards were taken from MIRINZ 908.	Noted – the minimum standard now reads “the correct current level must be attained within 1 second of the initiation of the stun and must be maintained for at least 1 – 3 seconds”.
5.4.2 Electrical Stunning, Minimum Standard No. 9(d), page 30	18	We request that the requirement of 2 seconds be reviewed (especially for sheep). We understand that Blackmore has published a paper endorsing 1 second. Industry is also able to provide data supporting 1 second as adequate.	Noted – the minimum standard now reads “the correct current level must be attained within 1 second of the initiation of the stun and must be maintained for at least 1 – 3 seconds”.

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5.4.2 Electrical Stunning, Minimum Standard No. 9(f), page 30	2	The standard should specify “Deer: 1.0 amp”. The Venison Processors Industry Agreed Standard states 1.0 amp minimum as opposed to 1.3.	Agree – although the minimum currents prescribed in MS 9(f) have been moved to general information (1.0 amps for deer).
5.4.2 Electrical Stunning, Minimum Standard No. 9(f), page 30	6	We believe the minimum current for pigs should be set at 1.0 amp. 1.3 amps assumes less than optimal positioning, as the additional point under General Information notes. Given the emphasis on training and competency we believe this margin of error is excessive.	Disagree – although the minimum currents prescribed in MS 9(f) have been moved to general information and brought into line with OIE guidelines (1.25 amps for pigs).

5.4.2 Electrical Stunning, Minimum Standard No. 9(f), page 30	18	We note that these currents vary to the OIE standards. Clarification is sought on most appropriate standards for NZ and the basis for any discrepancy with international standards.	Noted – the minimum currents prescribed in MS 9(f) have been moved to general information and brought into line with OIE guidelines.
5.4.2 Electrical Stunning, Minimum Standard No. 9(k), page 30	18	We note that there is a draft New Zealand standard, “Safe application of electricity in the meat processing industry”, that includes electrical stunning equipment. Refer Standards New Zealand, draft Code DZ6116.	Noted
5.4.2 Electrical Stunning, Recommended Best Practice, page 31	18	We suggest that the two paragraphs be amended to read: <p>“The use of head-to-body electrical stunning <u>is the preferred method for electrical stunning</u> <del>should be used whenever the products are not going to a halal market</del>, as stun-to-stick intervals are less critical as this method induces cardiac dysfunction.”  The focus of this code is animal welfare and not market access requirements.</p> <p><del>“There should be adequate monitoring of the system and efficient evacuation of animals</del> In the event of any system failure <u>animals should be able to be evacuated without causing undue stress.</u>”</p>	Agree in part – RBPs have been reworded.
5.4.3 Firearms, Introduction, page 31	18	We suggest that this should be amended to read: <p>“Free bullet firearms <u>can be</u> <del>are</del> used in pet food premises, and by home-kill service providers; and <del>It is permissible to use a free bullet firearm</del> in a slaughterhouse in an emergency (subject to OSH requirements).” It is an issue of what is permissible rather than what is actually happening.</p>	Agree in part – paragraph has been rewritten.
5.4.3 Firearms, Minimum Standard No. 10, page 31	7	What are the “relevant” minimum standards referred to? Would a homekill service provider be wrong to decide none of these are relevant to their operation on the farm?	Noted – unclear what is exactly being referred to, however, a new minimum standard has been added to clarify which

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			minimum standards in the code specifically apply to homekill service providers.

5.5 Stunning to Bleeding Out, Minimum Standard No. 11, page 32	3	We note that NAWAC proposes to make exceptions to minimum standards on religious grounds. We consider that if religious concerns of a particular group can be taken into account, then there should be no reason why the needs of the industry, and the particular circumstances that reflect the realities of New Zealand rural life that rural butchers service, cannot also be taken into account.	Noted – the Animal Welfare Act provides that NAWAC must have regard to the requirements of religious practices, but does not provide for parity of treatment to other sectors of the community. The issue has been carefully considered by NAWAC again in the light of the submission; however, NAWAC does not accept the argument put forward in the submission.
5.5 Stunning to Bleeding Out, Minimum Standard No. 11(a), page 32	2	We note that the stun needs to be successful before bleeding can proceed.	Agree – minimum standard has been amended to “unless it has been effectively stunned”.
5.5 Stunning to Bleeding Out, Minimum Standard No. 11(b), page 32	18	We are unclear as to whether this refers to start or end of bleeding out.	Noted – minimum standard has been amended to “effective bleeding out”.
5.5 Stunning to Bleeding Out, Minimum Standard No. 11(c)(iii), page 33	5	An additional clause (iv) was inadvertently omitted from the draft; the clauses are a direct transfer of the current industry accepted standards from IS5. Minimum Standard No. 11 (c) needs to incorporate all of the current options in use as there are no differences in animal welfare outcomes from the different methods of transverse neck incision. IS5 clause (iv) reads:  “A transverse incision in the neck without the skin being opened first.”	Agree in part – change made to minimum standard to encompass all transverse neck incisions
5.5 Stunning to Bleeding Out, Minimum Standard No. 11(d), page 33	2	We note that this should read “When head-only reversible electrical stunning ... within 20 seconds of stunning”. This would be consistent with the Venison Processors Industry Agreed Standard which states 20 seconds minimum as opposed to 25. This position was agreed by the MIA [18] which quoted the OIE standard (3.7.5.7.5).	Agree – change made to minimum standard.
5.5 Stunning to Bleeding Out, Minimum Standard No. 11(d), page 33	3	We note that the Code prescribes the number of seconds between stunning when the incision is made but does not reference it to any supporting scientific evidence.	Noted – supporting scientific evidence is provided in the report to the Minister which accompanies the draft code.

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5.5 Stunning to Bleeding Out, Minimum Standard No. 11(d), page 33	9	In our view, 25 seconds is too long, 10 is ideal and 20 an absolute maximum.	Agree – minimum standard has been changed to 20 seconds.
5.5 Stunning to Bleeding Out, Minimum Standard No. 11(e)(ii), page 33	18, 4	<p>NAWAC will be aware of the issues around the requirement for a thoracic stick of cattle within 35 seconds of stunning. MWNZ [4] supports thoracic sticking post head only electrical stunning for cattle and contends that if a time is set from stunning to thoracic stick this needs to be scientifically substantiated from an animal welfare perspective. Various literature is available on the time of insensibility from stun for different species the basis for the proposed minimum standard should reflect that information and be referenced.</p> <p>MIA [18] have been unable to locate the scientific research supporting the proposed standard of 35 seconds. MIA recommends that NAWAC locate and provide the Association with the scientific basis for this minimum standard. Once this information has been received and evaluated, the Association requests the opportunity to provide further comment on any recommendations resulting from that consideration before a standard is set.</p>	Noted – the time limit has been revised to 40 seconds and supporting scientific evidence is provided in the report to the Minister which accompanies the draft code.
6 Small Mammals, Minimum Standard No. 12, page 34	9	We note that there is no minimum time set for the holding of small mammals without food or about access to water. There also does not seem to be any provision for pre-slaughter inspection. This is something of an inconsistency between species. It is covered for all by section 3, but then for large mammals it is specifically mentioned again (Minimum Standard No. 12 5(h)) but not for the other species.	Agree in part – appropriate new minimum standards covering access to water and feeding of maintenance rations have been added to the code.
6 Small Mammals, Minimum Standard No. 12(i), page 34	9	We note that this restricts stunning to only three methods, not including manual concussion.	Noted – manual concussion has been added to, and controlled atmosphere stunning removed from, the minimum standard.
7 Birds, Minimum Standard No. 13, page 38	9	We note that there is no minimum time set in Minimum Standard No. 13 for the holding of poultry without food or about access to water, although there is mention of this under ostriches and emus. There also does not seem to be any provision for normal pre-slaughter inspection, as mentioned earlier under “Small Mammals”.	Agree in part – a new minimum standard has been added that birds held for longer than 18 hours at slaughter premises must be fed maintenance rations and given access to water.

7 Birds, Minimum Standard No. 13, page 38	10	We support this minimum standard as it applies to poultry.	Noted
7.1 Poultry, Introduction,	9	We question the reference to age because, regardless of age, all birds need to be	Noted – the reference to age is merely

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page 39		treated appropriately.	provided as background information on the slaughter of poultry.
7.1.1 Pre-slaughter Presentation and Handling, Minimum Standard No. 14, page 39	10	We support this minimum standard.	Noted
7.1.1 Pre-slaughter Presentation and Handling, Recommended Best Practice, page 39	9	Do the specifics of holding birds include that they are to be held “upside down”?	Disagree
7.1.1 Pre-slaughter Presentation and Handling, General Information, page 39	14	The time periods of 12 and 25 seconds of inverted restraint prior to stunning seem very long for a bird to endure. This does not seem to be a humane pre-slaughter handling procedure. It also seems that there is undesirable inconsistency in the electrical stunning procedure, with some birds entering cardiac arrest and some not.  Considering how easy fowls are to handle it should be feasible to kill them far more humanely, in a very short time, for instance by decapitation with simultaneous treatment (such as crushing) to destroy the brain.	Noted – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC’s view on decapitation.
7.1.2 Stunning and Neck Cutting, Minimum Standard No. 15, page 40	10	We support this minimum standard.	Noted
7.1.2 Stunning and Neck Cutting, Minimum Standard No. 15, page 40	9	We note that there does not appear to be a minimum standard requiring investigation and remedy of ineffective stunning requiring repeat stunning in excess of 2% as is the case for large and small mammals.	Noted.



7.1.3 Automatic Waterbath Stunning, Minimum Standard No. 16, page 40	10	We support clauses (a), (c), (d), (e) and (f) but submit that (b) must be rewritten. There are industry water bath stunners that are head only stunners and therefore the wings or the rest of the body are not immersed. Minimum Standard No. 16(b) as currently written would require the wings to be immersed. Minimum Standard No. 16(b) as currently written only applies to full body water-bath stunning and the clause needs to be rewritten to address the variation in industry equipment.	Agree – minimum standard has been deleted.
7.1.3 Automatic Waterbath Stunning, Minimum Standard No. 16(f), page	14	Can some guidelines be provided as to the appearance of the bird when this might happen, or signs that it is happening?	Agree in part – minimum standard now includes the result i.e. resulting in an ineffective stun.

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7.1.3 Automatic Waterbath Stunning, Recommended Best Practice, page 41	10	This refers to cardiac arrest. We submit that current industry knowledge and equipment would not lead to an achievement of 100% cardiac arrest. The process requires further research and study before it should be recommended as a recommended best practice.	Disagree – this is a RBP and is not a minimum standard.
7.1.3 Automatic Waterbath Stunning, General Information, page 41	9	The first two paragraphs should be recommended best practices.	Disagree – NAWAC believes that these two paragraphs are appropriate as general information.
7.1.4 Handheld Headonly Stunners, Minimum Standard No. 17, page 42	10	We support this minimum standard as it ensures appropriate welfare standards are met. We note that we are unaware of commercial operators using handheld head only stunners.	Noted
7.1.4 Handheld Headonly Stunners, Recommended Best Practice, page 42	10	This refers to cardiac arrest. We submit that current industry knowledge and equipment would not lead to an achievement of 100% cardiac arrest. The process requires further research and study before it should be recommended as a recommended best practice.	Disagree – this is a RBP and is not a minimum standard.

7.1.5 Neck Cutting, Minimum Standard No. 18, page 42	10	<p>We do not support this minimum standard as written. We fully support the welfare issue that a full bleed out occurs and the bird is dead before it enters the scalding tank.</p> <p>It is not possible to ensure on all occasions that both carotid arteries are cut. However, as the plants are structured the amount of time for bleeding out will ensure that even with one artery cut full bleed out occurs and the bird is dead.</p> <p>The requirement for cutting of both arteries may not be able to be met and will thus place the operator in breach of the standard although the bird having bled out is dead and no welfare issue arises. We submit that standards should set outcome requirements and that this standard as worded does not do that.</p>	Agree – the minimum standard has been rewritten to address this issue.
7.1.5 Neck Cutting, Minimum Standard No. 18, page 42	11	<p>We are extremely concerned that, where birds do not have both their carotid arteries severed by automatic neck cutters, the attendant stationed beyond the automatic neck cutters may miss seeing the birds as they pass on the chain, and that the birds therefore have the potential to regain consciousness during the bleeding period before entering the scalding tank.</p> <p>We submit that the code should provide for regular audited checks of a sample of birds before they enter the scalding tank to ensure that 100 per cent of birds are</p>	Disagree – however, NAWAC has noted in its report to the Minister, which accompanies the draft code, that it would like to see industry-led research to show that the minimum standard is being fully complied with on an ongoing basis (i.e. all birds are dead on entering the

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		arriving with both carotid arteries severed.	scalding tank).
7.2 Ostrich and Emu, Minimum Standard No. 19(d), page 44	9	We note that the two minutes between stun and neck cut seems to be a very long time, which could allow for recovery.	Agree – minimum standard has been changed from two minutes to one minute.
8.1 Farmed and Captured Wild Finfish including Eels, Minimum Standard No. 20(b), page 46	8	There is no definition of “overcrowded” in the code. Is it correct to assume that this will be left to the experience of the operators to determine best practice in relation to their operations? Or is this intended to be specified?	Noted – information has been added on signs of welfare compromise in finfish.
8.1 Farmed and Captured Wild Finfish including Eels, Minimum Standard No. 20(b), page 46	9	This is an area where breaches are potentially likely but will be difficult to enforce unless there are some appropriate guidelines on stocking densities.	Agree – information has been added on signs of welfare compromise in finfish.

8.1 Farmed and Captured Wild Finfish including Eels, Minimum Standard No. 20(b), page 46	14	What information exists that identifies crowding conditions where welfare will be compromised? If no information is available then there is no point in having this minimum standard. If it exists then it should be provided as general information.	Agree – information has been added on signs of welfare compromise in finfish.
8.1 Farmed and Captured Wild Finfish including Eels, Minimum Standard No. 20(f), page 46	8	<p>The desliming of eels using salt (prior to death) is a current industry practice that is recognised in the Industry Agreed Implementation Standards (IAIS) which are verified by the New Zealand Food Safety Authority (Verification Agency). The desliming of eels by salt is an approved method of killing eels (IAIS 003.4, section 2.2).</p> <p>The industry has investigated alternative methods of desliming eels; however, a reasonable cost-effective technology that does not result in significant loss of quality has not yet been developed.</p> <p>The industry is strongly opposed to the inclusion of “Eels must be killed before they are deslimed” in the code, and request that this requirement be removed.</p>	Agree in part – from 1 January 2015 NAWAC requires eels to be rendered insensible for the duration of the desliming process. The report to the Minister, which accompanies the draft code, fully addresses this issue.
8.2 Crabs, Rock Lobsters and Crayfish, Minimum Standard No. 21(b), page 47	8	We note that because there is no definition of “overcrowded” in the code, is it correct to assume that this will be left to the experience of the operators to determine best practice in relation to their operations? Or is this intended to be specified?	Noted – information has been added on signs of welfare compromise in crustaceans.
8.2 Crabs, Rock Lobsters and Crayfish, Minimum	9	This is an area where breaches are potentially likely but will be difficult to enforce unless there are some appropriate guidelines on stocking densities.	Noted – information has been added on signs of welfare compromise in

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Standard No. 21(b), page 47			crustaceans.
8.2 Crabs, Rock Lobsters and Crayfish, Minimum Standard No. 21(b), page 47	14	What information exists that identifies crowding conditions where welfare will be compromised? If no information is available then there is no point in having this minimum standard. If it exists then it should be provided as general information.	Agree – information has been added on signs of welfare compromise in crustaceans.

8.2 Crabs, Rock Lobsters and Crayfish, Minimum Standard No. 21(d) and (e), page 47	9	<p>There is some confusion in statements about killing crabs, rock lobsters and crayfish.</p> <p>While (e) says how not to do it, and (d) says they must have been chilled before killing, there is no clear statement about acceptable ways to go about the procedure, apart from the implication in General Information that if they are chilled for long enough, they'll be dead anyway, and a General Information that they should not be separated between the abdomen and thorax or have tissue or flesh removed while they are still alive.</p> <p>We recommend that a description of the methods of head and chest spiking or splitting are included in General Information.</p>	Disagree – however, minimum standard has been rewritten to clarify the issue. Now all crabs, rock lobsters and freshwater crayfish must be electrically stunned or chilled to less than 4°C before they are killed.
8.2 Crabs, Rock Lobsters and Crayfish, Minimum Standard No. 21(e), page 47	8	<p>This is a current industry practice used when lobsters are required for further processing and the IAIS (section 3.3.2) allows lobsters to be placed in slurries made up of potable water ice and potable water.</p> <p>The industry is strongly opposed to this standard and related statements being included in General Information and request that these requirements be removed.</p>	Noted – minimum standard and general information have been rewritten to address industry concerns.
8.2 Crabs, Rock Lobsters and Crayfish, General Information, page 48	8	<p>The statement that “Any processing of crayfish or lobster involving the separation of the abdomen from the thorax while the animal is still alive, etc” is a direct contradiction of the current regulatory requirements (IAIS 003.5, section 3.7.2) which states that rock lobsters are to be alive immediately before the process of tailing.</p> <p>The Industry Agreed Implementation Standards can be located from the NZFSA website: <a href="http://www.nzfsa.govt.nz">www.nzfsa.govt.nz</a>.</p>	Noted – the general information has been rewritten to address industry concerns.
8.2 Crabs, Rock Lobsters and Crayfish, General Information, page 48	14	<p>JP said that the animals will “die without suffering” is conjecture. There are stressors which may cause suffering including capture, handling and possibly the experience of introduction to the ice slurry.</p>	Agree –general information has been rewritten and no longer contains reference to “animals will die without suffering”.

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9 Shechita Slaughter, Introduction, page 49	1	We accept the points made and believe that the proposed minimum standard allows us to follow our religious obligations.	Noted

<p>9 Shechita Slaughter, Introduction, page 49</p>	<p>4</p>	<p>By far the biggest issue associated with the code is the section on Shechita slaughter. This method of slaughter as an exception to the code raises a number of concerns for the industry as follows:</p> <p>1 The object of the Animal Welfare Act should be paramount in this process.</p> <p>2 We consider non-stun slaughter to be inhumane.</p> <p>3 The right to the manifestation of religion and worship should be protected. However, Shechita slaughter without pre-slaughter stunning introduces a requirement that is at odds with New Zealand's prevailing culture. The current practice for slaughter is reasonable and acts within the scope of the New Zealand Bill of Rights Act 1990.</p> <p>4 Any change to the standards applying to pre-slaughter stunning as currently required would most likely have significant detrimental effects on the New Zealand meat export industry.</p> <p>5 Any change to the standards applying to pre-slaughter stunning as currently required would most likely have significant detrimental effects on the New Zealand meat export industry in animal welfare sensitive markets particularly Europe and specifically the UK. Europe is the major destination for New Zealand sheepmeat taking 50% of the trade and the UK makes up half of this market. Both of these markets are very sensitive to welfare issues. Recently when Halal slaughter was featured on a UK farm programme we received a number of emails requesting information on the Halal status of New Zealand meat, and many correspondents explicitly stated that they would not buy New Zealand lamb if it was Halal slaughtered.</p> <p>6 Accordingly, we would support a code of welfare that made no dispensations from the general slaughter provisions.</p> <p>7 The Israeli Rabbinate will not accept that an animal which is unconscious, but alive at time of slaughter, is acceptable under the Shechita dietary requirements. Muslims, although they have accepted electrical stunning, would if offered the choice of not using electrical stunning, prefer it over having the animal stunned.</p> <p>8 If the Shechita slaughter for export was adopted in New Zealand, Muslim markets</p>	<p>Disagree – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC's view on this issue.</p>
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		<p>which have till now accepted electrical stunning would immediately revert to demanding that animals not be stunned.</p> <p>9 The flow-on effect of NZ not stunning for Muslim and Shechita markets would be that the EU (the NZ EC veterinary agreement notwithstanding) could not accept beef or sheepmeat from NZ animals which had not been rendered insensible to pain prior to slaughter. Considering the relative proportions of meat slaughtered Halal to that exported to Halal markets, it would be totally unacceptable if NZ was not able to supply all its current high volume and high priced EU market. The EU takes 64% of NZ sheepmeat.</p> <p>10 Up until now there has been no published basis for allowing Shechita slaughter, and applications for exceptions to the welfare standard have required the permission of the Director-General of Agriculture. This system has the benefit of keeping any exceptional circumstances at a minimum level. Should NAWAC determine that the Bill of Rights requires them to allow Shechita slaughter for local product, then this would be the preferred option for administration.</p>	
9 Shechita Slaughter, Introduction, page 49	9	We are mindful of NAWAC's obligations to have regard for religious or cultural practices. However, given current scientific evidence, we do not support the decision to allow Shechita killing because of the resultant compromise to animal welfare.	Disagree – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC's view on this issue.
9 Shechita Slaughter, Introduction, page 49	11	<p>We are opposed to any method of commercial slaughter that does not involve the stunning of animals prior to slaughter, such methods of stunning to be capable of instantaneously rendering the animals insensible to pain until the animal is dead. We do not support any exceptions to this principle based on religious grounds. This was expressed in our submission on NAWAC's religious slaughter discussion paper.</p> <p>We therefore strongly submit that section 9, which provides minimum standards for Shechita slaughter without prior stunning, be deleted in its entirety.</p>	Disagree – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC's view on this issue.
9 Shechita Slaughter, Introduction, page 49	12	<p>We submit that the statement “Notwithstanding this minimum standard, this code permits Shechita slaughter for the purpose of producing animal products only for human consumption in New Zealand” is a self-contradiction when considered in terms of subsequent Minimum Standard No. 22.</p> <p>The secretary will be aware of previous submissions made by the Jewish community on this issue and their rabbinical authority (London Bet Din) has stated</p>	Disagree – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC's view on this issue.

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		<p>categorically that stunning an animal within 5 seconds of the Shechita cut is unacceptable according to Jewish law. Such an animal would be rendered nonkosher. If the Code requires that cattle be stunned within 5 seconds of the bleeding cut, then it would be impossible to slaughter animals for kosher consumption. The 5 second requirement does not permit it as in the above quotation but effectively prohibits Shechita. The Wellington Hebrew Congregation objects to the curtailing of its rights to practice its religion freely and objects specifically to the prohibition of Shechitah. It is insulting and offensive for NAWAC to define what the parameters of Shechita may include. It is up to rabbinic authorities to define Shechita.</p> <p>“Minimum Standard 22 provides for Shechita slaughter to meet the religious requirements of the New Zealand Jewish community.”</p> <p>This statement is therefore simply untrue. The standard does not provide for Shechita slaughter and does not allow us to meet our requirements. What it permits is something other than Shechita.</p> <p>The disallowing of Shechita is especially unfair when different standards are applied to hunting animals and to home kill. It is easy to conclude that Shechita has been specifically targeted in this draft code. Humane treatment of animals is one of the central tenets of the Jewish faith and we believe that Shechita, properly performed by a qualified shochet is the most humane method of animal slaughter. Every effort should be made to permit the continued practice of Shechita in New Zealand as an example of humane slaughter. Stunning animals is unnecessary and not an ideal part of Shechita; however, the Wellington Hebrew Congregation has decided to accept the status quo where the animal is stunned after the throat cut but in a time frame that is acceptable to our rabbinic authorities.</p> <p>Our recommendation: We support the status quo where there is post-cut stunning in a time frame acceptable to our rabbinic authority, the London Beth Din, although our preference is for no stunning requirement at all.</p>	

9 Shechita Slaughter, Introduction, page 49	15	Those aspects of the Draft Code that this submission opposes are as follows and are with regard to Minimum Standard 22- Shechita Slaughter, the integrity of the consultation process to date on the two draft Codes of Welfare – Commercial Slaughter, NAWAC’s decision to remove Halal slaughter from the latest Draft Code and the quality, integrity and impartiality of advice provided by MAF to the public, the Minister of Agriculture and the NAWAC committee.	Disagree – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC’s view on this issue.
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9 Shechita Slaughter, Introduction, page 49	16	Submitter “openly critical of ritual slaughter” because “unprecedented cruel practices which in this case involve long condemned sacrifices that should be abhorrent to a civilised government, have been allowed to prioritise animal protective legislation.”	Disagree – refer to the report to the Minister that accompanies the draft code for a full explanation of NAWAC’s view on this issue.
10 Homekill Service Providers, page 50	3, 7	The Code does not state which of the minimum standards are relevant to homekill services providers. We would like clarification on this matter in order to consult more effectively with our NZ Rural Butchers Association industry group members. It is critical that the unique environment and conditions under which rural butchers operate are given sufficient consideration. We are very concerned about the clarity of this section and its potential consequences should a homekill butcher misjudge which minimum standards are relevant to him or her.	Noted – a new minimum standard has been added to clarify which minimum standards in the code specifically apply to homekill service providers
11 Quality Management, page 51	3	We recommend that the requirement for a quality management programme be reviewed.	Noted – NAWAC has reviewed this requirement and confirmed it will remain in the code.
11 Quality Management, page 51	7	Our members do not think this has any place in their operations and we object to its implication that our members need such a system in place for their on-farm activities. Nor are we happy with the suggested independent verification of any such programme	Agree – NAWAC never intended for homekill service providers to comply with this minimum standard. The minimum standard has been reworded to make this clear.



11 Quality Management, page 51	17	I consider that section 11 is central to this code's successful implementation. Without a workable, enforceable and enforced quality assurance system the Code is meaningless. This relies very heavily on MAF having the will, and sufficient resources, to make this system happen.	Noted
11 Quality Management, Introduction, 4th para, page 51	14	I suggest that the last sentence should be amended: “... should include verification that <u>handling</u> , stunning and bleeding out are being performed <u>competently</u> ”.	Agree – change made to introduction.
11 Quality Management, Introduction, last para, page 51	2	The term “Standard AS/NZ 9002” needs to be changed to AS/NZ 9001 as this set of standards was merged into the one Standard AS/NZ 9001 in 2004.	Agree – change made to introduction.
11 Quality Management, Introduction, last para,	18	The quality system should be based on the general principles of Standard AS/NZ ISO 9001:2000 Quality Management Systems Requirements.	Agree – change made to introduction.

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page 51			
11 Quality Management, Minimum Standard No. 23, page 51	3	We are concerned with the prescriptive nature of parts of Minimum Standard No. 23.	Noted – NAWAC believes that the minimum standard, as written, is appropriate. Refer to the report to the Minister which accompanies the draft code for further information on this issue.
11 Quality Management, Minimum Standard No. 23(a), page 51	3	We are unclear as to what the objective of this wording is and are concerned that it may unintentionally apply to some operations where this is not an appropriate requirement. We also question why it is appropriate for this Code to be subject to an auditable system, when other Codes do not require such paperwork. We also question how such a requirement will be policed. Some premises which are audited by customers for commercial reasons will have no problem complying with this; however, for others it could create the need for a lot of extra paperwork and cost for no clear reason.	Noted – NAWAC never intended for homekill service providers to comply with this minimum standard. The minimum standard has been reworded to make this clear. Refer to the report to the Minister which accompanies the draft code for further information on this issue.

11 Quality Management, Minimum Standard No. 23(a), page 51	18	There should be no distinction between slaughtering premises and homekill operators.	Disagree – NAWAC never intended for homekill service providers to comply with this minimum standard. The minimum standard has been reworded to make this clear.
11 Quality Management, Minimum Standard No. 23(b)(iii), page 51	3	We considers that Minimum Standard No. 23(b) is not necessarily relevant to the welfare of slaughter animals.	Disagree – refer to the report to the Minister which accompanies the draft code for further information on this issue.
11 Quality Management, Minimum Standard No. 23(b)(iii), page 51	14	I suggest modification to read: “System of frequency of checks on facilities, equipment and <u>performance of persons</u> carrying ...”	Disagree – the minimum standard is correct as written.
11 Quality Management, Minimum Standard No. 23(c), page 52	5	Further clarification is required from Biosecurity New Zealand on the regulatory mechanisms and expected level of compliance for this Code of Welfare.  Official verification and certification programmes administered under the Animal Products Act apply at export slaughter premises, as required to meet overseas market access expectations. This ensures a high level of compliance with the code	Noted.
<b>CODE SEC OR MIN STD</b>	<b>SUB REF</b>	<b>SUBMISSION</b>	<b>NAWAC RESPONSE</b>
		at export premises.  Clarification of the intended level and delivery of official verification which may be required at non-export animal slaughter premises is required, due to the revocation of the relevant Meat Act regulations at the time that this code is issued.	
11 Quality Management, Minimum Standard No. 23(c), page 52	18	We ask for deletion of “on at least an annual basis” because annual verification will be too onerous in some instances and the frequency should be appropriate to the circumstances.	Disagree – NAWAC believes that independent verification on an annual basis is appropriate given the critical nature of the processes and their potential impact on animal welfare if not carried out correctly.

11 Quality Management, Minimum Standard No. 23(c), page 52	3	We do not support (c), which requires documented programmes to be independently verified on at least an annual basis. The reason for this requirement is not explained and the Code does not detail who will verify such a programme and at whose expense.	Disagree – NAWAC believes that independent verification on an annual basis is appropriate given the critical nature of the processes and their potential impact on animal welfare if not carried out correctly.
Appendix V Lairage Stocking Density, page 65	18	We note that there is no information for bobby calves.	Noted – this appendix has been deleted from the code.