

**Animal Welfare (Dairy Cattle) Code of Welfare Amendment - Calves
Summary of Submissions from Public Consultation 2014**

Submission numbers

Copied email (unknown origin)	73
Individual submissions	284
Total	357

No. of submissions	Comment	NAWAC Response
<p>73 Email (unknown origin)</p>	<p>NAWAC Secretary Animal Welfare Ministry for Primary Industries PO Box 2526 Wellington 6140 NEW ZEALAND</p> <p>Dear Madam, dear Sir,</p> <p>Imagine being born, taken from your mother and either bludgeoned to death or sent to the slaughter house mere days later. You're nothing - just a waste product of the dairy industry. This is what happens to 1.7 million NZ calves.</p> <p>https://www.youtube.com/watch?v=7suPjXRwVTk</p> <p>HSUS Investigation of Catelli Bros. Calf Slaughter Plant http://freefromharm.org/animal-cruelty-investigation/saddest-slaughterhouse-video-ever-shows-no-blood-or-slaughter/</p> <p>Saddest Slaughterhouse Footage Ever Shows No Blood Or Slaughter - See more at: http://freefromharm.org/animal-cruelty-investigation/saddest-slaughterhouse-video-ever-shows-no-blood-or-slaughter/#sthash.jbbUjv3f.dpuf</p> <p>Saddest Slaughterhouse Footage Ever Shows No Blood Or Slaughter</p> <p>Many of us were absolutely horrified about the cruel treatment of calves, both overseas by NZ farmers and on our own farms here in Zealand. Shockingly it is still legal for farmers to bash calves to death with a hammer, or any other implement.</p> <p>This must stop.</p> <p>Because they are not needed by the dairy industry, every year around 1.7 million calves are treated as mere waste products with little or no attention given to their welfare.</p> <p>These are bobby calves - vulnerable young animals no longer needed and brutally discarded.</p> <p>The Government proposed that blunt force trauma may not be used for the routine killing of unwanted dairy calves.</p> <p>This will not solve all the issues and there will still be millions of calves routinely killed as 'waste products' it is a step in the right direction of recognising that the suffering of these baby animals matters.</p> <p>Sincerely, X [Country – most not from NZ] [Pictures of slaughterhouse inserted]</p>	

	General Comments	
Submission	Comments	NAWAC Response
<p>1, 2, 3, 7, 14, 21, 22, 27, 56, 58, 63, 66, 77, 95, 128, 133, 181, 221, 222, 223, 233, 242, 247, 252, 257, 271, 275, 276, 278, 280, 281, 282,</p>	<p>Support for restricting the use of blunt force by a blow to the head to emergencies only</p> <ul style="list-style-type: none"> I support the changes to the Minimum Standards in the Animal Welfare (Dairy Cattle) Code of Welfare 2010 in proposing that blunt force may not be used for the routine killing of unwanted dairy calves on the farm. I wholeheartedly support NAWAC in proposing that blunt force should not be used for routine killing anywhere on the farm. 63: WSPA fully supports the submission as proposed by NAWAC. WSPA believes blunt force should only be used in an emergency situation. WSPA considers shooting or captive bolt stunning to be more humane options than blunt force and hence supports NAWAC's proposal to identify shooting or bolt stunning as the recommended methods. My reasoning for supporting this proposal is because the blunt force option is, and will continue to be, undertaken by farm workers who have little or no experience in veterinary practice, bovine anatomy or euthanasia resulting in potentially prolonged painful and traumatic deaths for these animals. Quaker Concern for Animals (UK): We understand that it is still legal for farmers to kill calves with a hammer or any other implement. Fortunately, massive public outcry has provoked your government to react by proposing that blunt force trauma may not be used for the routine killing of unwanted dairy calves and are seeking public consultation on the proposed changes. We are formally asking you to ban this cruelty forthwith. Although it will not solve all the issues and there will still be millions of calves routinely killed as 'waste products', it is a step in the right direction of recognising that the suffering of these baby animals matters – and should matter to governments. I would like to state that I am of the opinion that the use of blunt force trauma is totally unacceptable for the routine destruction of dairy calves on farms on the grounds that it is completely inhumane. 222 VCNZ: VCNZ supports the changes proposed by NAWAC to sections 5.10 Calf Management and 6.4 Emergency Humane Destruction of the Code for the reasons set out below [See 'specific points' section]. It considers that it is unacceptable to use blunt force trauma for the routine killing of unwanted calves and is pleased that NAWAC is taking action to incorporate this issue into the minimum standards of the Code. 223 SAFE: SAFE supports the general intention of the proposed changes for bobby calves. Restricting the use of blunt force trauma is a step forward. New Zealand relies heavily on dairy exports and if for no other reason than ending the bad publicity surrounding this practice a ban should be implemented. 275 Federated Farmers Federated Farmers agrees with the changes proposed for the Animal Welfare (Dairy Cattle) Code of Welfare 2010 (the Code) on calf management and Emergency Humane Destruction. 276 Berakah Farms We support the review of sections 17 and 20 of the code to give better clarity to dairy farmers of where they stand. Over the years we have used the 3 main methods, blunt force, rifle and captive bolt for euthanasing calves. Our experience we have found the 22 rifle to be the most effective method in both quickness, cost effective and completion of death. 280 DairyNZ DairyNZ generally supports the proposal to amend the code of welfare for dairy cattle with regard to the on-farm euthanasia of calves. 281 DCANZ DCANZ generally considers the proposed changes to the Code are appropriate for ensuring that where euthanasia is necessary for dairy cattle is achieved humanely. Notwithstanding the above outlined general support for the proposal, DCANZ agrees with the specific wording changes proposed by DairyNZ. 	

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Opposition to restricting the use of blunt force by a blow to the head to emergencies only

- I am NOT in favour of legislating for compulsory use of Firearm or captive bolt devices for the destruction of unwanted calves on farms for the following reasons:
 - We must put human (Owner & Staff) safety before the safety of sick dying animals. (we don't put down healthy animals)
 - Blunt force is safe, Fast, & humane when carried out competently. (however never pleasant, let alone on prime TV)
 - Animals & Humans alike will move & reflex during the dying process. Even at freezing works, hospital or Home. This does not mean inhumane death has occurred. I think any Vet or doctor will confirm this.
 - Farmers already have a very poor statistic's in suicide rates in New Zealand. Putting Firearms or captive bolt devices on every farm at the most stressful time of the season will only add to these poor statistics.
 - Firearms must be stored in a clean, dry locked facility. This will only add to time the animal will suffer.
- I oppose the proposed changes to the code. I urge NAWAC to call for comparative research into the various methods, and use that research to either confirm the current code or to change it, based on animal welfare considerations first and foremost.
- A hammer is significantly safer for an operator to use than a gun or captive bolt. I predict unintentional wounding and even death of farmers may occur with the greater use of guns, or captive bolts, as the numbers of calves euthanaised on farm increases.
- We routinely euthanaise, using blunt force trauma, 1800 to 1900 calves every spring. We are convinced this method provides the best animal welfare outcome on our farms and the highest level of staff safety.
- I am concerned at the way we have reacted to public comment on "you tube" and later TV footage of what turned out to be a New Zealand citizen attempting to euthanaise a calf using "blunt force" while working in another country with a different jurisdiction to ours. This is with the back drop of the guilty plea by Euan McDonald (Scott Guy murder accused and acquitted) , to Animal Welfare offences including to the killing of my neighbours calves using a hammer. I am not sure why McDonald pleaded guilty at the time, we were euthanaising as many calves as McDonald did every day, next door, and I was certain what we were doing was lawful.
- I am dismayed to see NAWAC members quoted as saying such things as , " captive bolts are cheaper than firearms...".This gives the perception that decisions have already been made by at least some of the members of NAWAC, prior to considering submissions or making an effort to fully understand the issues.
- **250 ACT** While a NAWAC member I expressed many times that I was concerned that the committee was being put under increasing pressure to take higher cognisance of evolving societal expectation in its advisory role and that was potentially usurping the key role of the committee, that being to deliver highly researched, unemotionally charged realism in an animal welfare sense, into codes. So in this potential code amendment NAWAC, I contend, is being put under more pressure. In this instance I assume by the Minister who is reacting to a social media video clip from another country exposing a very poor attempt to impart blunt force trauma on a calf. I contend that no responsible New Zealand farmer condones that low skill exhibition but they are concerned about some emotively charged reactions to those images and the ensuing authoritarianism.
- My submission relates to the difference between blunt force trauma and captive bolt stunning. They are both the same in that both kill the animal in the same way. Whether using a hammer or a captive bolt the cause of death is blunt force trauma. In my experience both methods need to be undertaken by trained operators. Instant death is assured with blunt force trauma by hammer administered correctly but not in the case of captive bolt. For that reason blunt force trauma with a hammer is more acceptable as far as the animal welfare is concerned. NAWAC should be only concerned with the welfare of the calf and should only ban the use of blunt force trauma by hammer if it has evidence that this causes more distress to the animal than a captive bolt. I submit that the opposite is the case.

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Support for banning the use of blunt force, with no reference to routine vs. emergency situations

- A key value of the NZ Animal Welfare Strategy (May 2013) is "It matters how animals are treated – it matters to the animals and it matters to us". Clearly bludgeoning calves is in conflict with the NZ Animal Welfare Strategy.
- I write this submission to state my absolute abhorrence to the practice of the use of blunt force instruments on calves or any other animals in this country or anywhere else in the world.
- Using the blunt force of instruments to kill animals in this country SHOULD BE BANNED. There should be a law in place that prevents ANY farmer from doing this....and if they are caught they should perhaps be put out of practice, spend time in jail or perhaps be banged over the head with a blunt instrument themselves?
- I think that the element proposing the unlawfulness of bludgeoning of the animals to death is a step in the right direction.
- Because they have no voice it is up to us to stand up for their rights. So, BRING IN A LAW TO PROHIBIT SUCH BARBARIC AND INHUMANE BEHAVIOUR.
- Since learning about "bobby calves" I have significantly reduced my dairy intake to barely any. I'm horrified to learn that its still legal to bash an animal to death, its horrific and I'm writing to you, begging for you to make this illegal.
- I support the ban of the use of blunt force instruments on calves. This is far too open to abuse. Please ban this, it's the right thing to do.
- I demand to see a ban on outright cruelty such as the clubbing of calves, chasing cows on motorbikes and tail twisting all currently seen as OK practice here in NZ.
- It is pure cruelty, laziness and saving a few dollars that the farmer is practicing every time he carries out this despicable act.
- The killing of the calves by current methods is inhumane and cruel. There are quicker and painless alternatives.
- Please do the right thing and support banning the use of blunt force instruments to end the life of new born calves.
- I would like to see a more humane handling and exist for the bobby calves. A friend of mine worked at a certain Petfood place in the Waikato and they use hammers there to kill the calves so its not just down on the farm to kill sick animals. Its a wide spread practise. Its time now to review what happens to these lovely, innocent creatures and I implore you to do it this year before the milking season starts again.
- A alternative method must be found for the killing of dairy calves, as the current process is barbaric. We are not a civilised nation if we allow this sort of treatment of the innocent and vulnerable to continue. It is dreadful enough that these babies are considered waste products.
- There must be some kinder way to do this. I would like you to find a nicer way.
- I wish to put my name towards the banning of the use of blunt force instruments used on calves in the dairy industry. I do not believe this is a humane or quick killing method of these young animals.
- Banning the use of blunt force instruments on calves it the right thing to do as it is not necessary, it is cruel and unkind, and it makes humans look like real dicks.

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- We shouldn't have to send submissions in to have this done. It should be common sense, something we know we should do because it is the right thing to do.
- I am writing to express my concerns over the lack of regulation and ethics around the treatment / "disposal" of calves in New Zealand. I therefore wholeheartedly support the New Zealand government in deeming such treatment as illegal and applying regulations to prevent innocent babies from being bludgeoned.
- I want to see this practice banned and have fines or sentences associated with it, as it is for companion animals
- We are totally opposed to the inhuman slaughter of bobby calves carried out in this country using blunt force instruments. It is inconceivable that it is NOT illegal to bludgeon a young vulnerable animals to death.
- I am sending this email in an attempt to put a stop to the bludgeoning of animals New Zealand. There is plenty of scientific proof that these animals feel pain like we do they suffer and as a result we do too.
- I am writing to say that I am very much against the practice of killing cows in a painful and archaic manner (I am against killing any animals at all but that is another matter). This should be banned so we can let these poor creatures die in a less painful and cruel way.
- I would approve the banning of hitting bobby calves with blunt instruments as a first step towards more humane treatment of baby animals. I remember, as a young child, once seeing my father bash a bobby calf on the head. It was a sad shock, but one didn't question what was done on farms by one's elders.
- Please consider a more humane way of killing bobbie calves - pse.
- For the sake of all involved, this abhorrent practice must be stopped.
- I find it totally reprehensible that in 2014 dairy farmers are allowed to use a blunt force instrument to beat a calf to death. It's barbaric and abhorrent. It's sickening and vile. Unfortunately our current government appears not to care. It's unacceptable that MPI overseas the dairy industry and animal welfare.
- We want the government to intervene in the blunt force killing of bobby calves and create a law that makes it illegal and punishable with a jail term equivalent to manslaughter and/or murder.
- This is to support submissions to the Animal Welfare Act making it a crime to beat and/or other wise inhumanly dispose of Bobby Calves and other live stock.
- Please amend legislation so that only humane methods can be used to deal with unwanted calves, both in their killing and in their welfare prior to killing.
- I respectfully ask that you do all you can to initiate a ban of the use of blunt force instruments on the bobby calves as soon as possible and consequently reduce their suffering.
- I am shocked to discover that battering an animal to death was ever thought to be ok. Change this practice and replace it with a humane method that the rest of the world may approve of.
- Do something about it – NOW, not tomorrow. Excuses won't suffice.

<p>12, 37, 55, 60, 136, 152, 179, 284</p>	<p>Blunt force should never be used even in emergencies</p> <ul style="list-style-type: none"> • It is staggering that the practise of using blunt force instruments is considered ok 'when necessary', come on • I submit that any form of euthanasia used, on any animal, should be best practice. If it takes more than a single blow to kill a calf instantly, it is unacceptable and needs to be made illegal. • Please support the outlawing of the use of blunt force trauma to kill unwanted calves- be it routinely or otherwise • I strongly urge that there be a law change totally banning the use of blunt force in the killing of unwanted calves – mainly bobby calves. If a calf is in distress, suffering with ill health, surely a bullet to the head is far more humane. • It is necessary to stop calves being bludgeoned to death. Any animal killed should be put down humanely..... full stop. • Please and the use of blunt force trauma in all situations. • 284 Voiceless In relation to NAWAC's request for public submissions on the use of blunt trauma, it is Voiceless' position that blunt trauma is a cruel, imprecise and inhumane method of slaughter that cannot and should not be justified on economic grounds. Accordingly, Voiceless respectfully submits that the use of blunt trauma is not acceptable for either the routine slaughter or the emergency slaughter of bobby calves. 	
<p>44, 54, 60, 81, 103, 107, 111, 112, 122, 123, 124, 131, 156, 159, 180, 185, 191, 198, 207, 209, 231, 263</p>	<p>Calves should not be killed at all</p> <ul style="list-style-type: none"> • I wish to add my name to the hopefully very long list of people who quite rightly find the killing of bobby calves abhorrent • I do not support the routine killing of calves in the dairy industry • I do not support any routine killing of calves. In the meantime I strongly support any moves to raise the minimum standards involved in the routine killing of calves. • I strongly advocate for a humane way to kill the bobby calves - until my ultimate goal of the need for them to be killed at all, is obviated. The eyes of the world are upon the industry. • Surely with all the brains in New Zealand somebody could come up with a use for the bobby calves so that they do not have to be slaughtered virtually immediately after birth. • I am contacting you to ask you to please ban current baby cow slaughtering operations. These calves are living beings and our ecosystem is for everyone to share, please do not take away that right from other species. • I dread the thought of so many cows and bulls, young and old, being killed for food and convenience. Please rethink these actions. • When my Daughter read your article (Bay Chronicle, April 3, 2014) she couldn't believe the facts and bawled her eyes out, this prompted me into action so If there's anything me or my family members can do to stop this barbaric slaughter and give these calve sum basic rights, we would be more than glad to help • I realise this submission is to be about the method of destroying baby cows, and not necessarily trying to stop the practice of destroying baby cows, but I cannot focus on only the method when I believe that the practice should not be happening at all. • Morality dictates that the A.W.A must be changed so that dairy farmers must protect and care for all of the animals on their property until those animals die of old age. The full cost and responsibility of animal agriculture must be realised and borne by its practitioners. • I live in new Zealand and I do not agree with the cruel killings of calf's for the sake of milk. Please put a stop to the killings. 	

283	<p>Calves should not be killed on-farm</p> <ul style="list-style-type: none"> • 283 MIA The MIA recommends that the on-farm euthanasia of calves be prohibited, except in extreme circumstances. 	
59, 61, 88, 91, 107, 109, 114, 161,	<p>The killing should be humane (with no reference to blunt force)</p> <ul style="list-style-type: none"> • Please consider our request to make the slaughter as humane as possible. • I can understand that the need for milk is constant and I also understand that the cows need to be pregnant to produce milk, however this is no excuse to inhumanely kill the calves. It is very easy to correctly and in-expensively euthanase the calves. I strongly feel that there needs to be rules/laws in place for this. • Please make a respectful and kind choice for all in the world! • If an animal has to be killed then it MUST be done humanely. • STOP inhumane practises of killing baby calves! What the ... • Yes I consume dairy products, but I don't agree with the way calves are taken from their mothers so soon. They need colostrum, and if they are to be killed, do it humanely. 	
74, 119, 284	<p>Transport</p> <ul style="list-style-type: none"> • I don't think this one proposal goes far enough; I would like to see it made law that the calves are treated humanely on their way to the slaughterhouse. They need to be given food and water on long journeys, and treated with respect, and not injured by the way they are handled or transported. • Whether the calves are bashed to death or whether they go to the slaughter house crammed in trucks with other crying/traumatised calves, it's totally abhorrent. • 284 Voiceless Voiceless recommends an alternative or improved transport system instead of resorting to blunt trauma. There is abundant evidence to show the increased mortality rates of transported calves. One Study notes "there is more potential for transportation to adversely affect the welfare of a calf than a mature animal because of the incomplete development of the hypothalamic pituitary axis combined with the fact that calves are exposed to a multitude of novel and stressful events, including weaning, processing, handling..."²⁸ If bobby calves must be transported, the relevant standards must be improved. 	
60, 74, 96, 112, 131, 142, 163, 205, 230, 253	<p>Calves should not be removed from their mother</p> <ul style="list-style-type: none"> • I would also like to see the law changed to allow the calves to stay with their mothers for longer than 4 days • Calves should Obviously be left with their Mothers to Live out their Lives in Peace and Safety. • What the mother cow would do when her son peeks out in to the world for the first time. And she knows she will only have one divine moment with him. I wonder if you care about this at all instead of being numb like the rest of them. I've heard them crying in utter gut wrenching despair. Not unlike yourself - I know that your there. Even if you pretend you aren't anymore. • Is it possible even that cows could be allowed to feed their babies AND allowed to have a few years of decent life? • I wish that calf's could remain with their mothers as nature intended, not heartlessly torn from them. • I know the dairy industry is not going away, so I support a humane way of keeping these calves and following both calf and mother natural behaviour until they are old enough to be separated. 	

<p>37, 66, 175, 192, 223, 275, 280, 283</p>	<p>Training</p> <ul style="list-style-type: none"> • If blunt force trauma is humane if done correctly, then I submit that any use of it requires adequate training and that that training is documented. • In order to ensure a swift and painless death euthanasia should be undertaken only by a trained veterinarian or at least a trained farm worker who is trained/supervised/monitored in the process of captive bolt stunning, followed by blunt force to the insensible calf as required. • Blunt trauma may not render immediate unconsciousness and alternate methods such as shooting or captive bolt employed by trained (and preferably certified) individuals is preferable. • Minimum standards need to be set to ensure that people killing any animals including calves are trained and competent, using the most effective methods possible to ensure the animal is immediately rendered unconscious and to ensure they are then immediately killed, never re gaining consciousness. • 223 SAFE: SAFE supports the intention of the code amendments to require a greater degree of suitable training and competency. However, there needs to be greater clarity as to what is expected in terms of training and competency. 23. Any person performing humane destruction of an animal must be experienced, or supervised by someone who is experienced. 24. Training must include identifying the best course of action. It is not enough for a person in charge of an animal to know how to carry out humane destruction; a person in charge of an animal must also know what situations qualify as an emergency, and know how to prevent an emergency from occurring in the first place. That person must also be aware of the best equipment to use for each situation. 25. Training must include preventative action. A person in charge of an animal must know where all relevant equipment is, and know in what situations that equipment can be used. • 275 Federated Farmers submits that any procedure used to kill an animal requires skill and training. Good practice on farm is to train the most suitable person so that the procedure can be well managed. Veterinarians and the industry could take a lead in this training. • 280 DairyNZ In addition we suggest a comment is added to the Code on the importance of maintaining captive bolts so they work properly and also on the importance of safe storage. Both these points are covered in DairyNZ training material on the use of captive bolts. • 283 MIA MIA submits that to ensure the welfare of animals is maintained during on-farm euthanasia, that the euthanasia must be carried out by a person trained and competent to perform the procedure. 47. MIA recommends that the competency requirements in minimum standard No 2 of the Commercial Slaughter Code of Welfare be included in the Dairy Cattle code. 	
<p>88</p>	<p>Labeling</p> <ul style="list-style-type: none"> • As a consumer of milk how am I meant to know what milk is essentially "cruelty" free. Is there such an option? Are all dairy farmers like this? I feel I should be able to know, just as I would when purchasing other good such as free range meat and eggs, that my milk has come from a cow whom was free to roam a paddock and naturally gave birth without her calves being taken away and/or killed inhumanly. Isn't this illegal now? Shouldn't my milk carton be labeled accordingly? 	

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Reform dairy farming

- I would like to see a total ban on all large scale dairy farming.
- To ensure there is not an influx of bobby calves the farming industry must stop inseminating cows at the rate they do. The government needs to revise the entire farming sector so that farm animals generally and cows and calves are treated humanely.
- Ideally there would be a reduction in the size and number of dairy farms as the problem of cow faeces is a very real one, but we realise that whilst there is a financial motive this will be very hard to achieve.
- The dairy industry needs to clean up it's act.
- Farming practices in New Zealand are amongst the worst in the developed world as media reporting of even the minimal number of cases which reach public attention demonstrate. Dairy farming is the worst form of exploitation and unnecessarily brutal. I implore the Minister for Primary Industries, and all those others with power to effect change, to please help make a difference in preventing cruelty to animals and to impose measures to ensure that all creatures are treated with respect and not subjected to these inhumane farming methods.
- a mase of feces collecting pasture fields,with a steady flow making it's way into what was once a pristine ocean,native animals in constant retreat,left to battle out there very existence on offshore islands or isolated pockets of bush,all to make way for an industry that kills and takes from it's participants,unethical untimely death standard industry practice,green house omissions acceptable,pollution level o.k,death of new zealand rivers and streams fine.all of this,all of this,so someone can have a thimble of milk in there coffee because it pleases them.the dairy industries time is fast coming to an end,there are plant based alternatives with none of the above effects
- No animal deserves to die in this way. I live next to a dairy farm and bobby calf season is horrific for me, they are with their mothers only 2 hours before they are taken. Someone needs to think of a way (an injection or something) to produce milk without such a waste.
- Long term pain for show term profit. The tipple that's filled with pus because - we must; we must; we must increase our busting milk industry? To serve foreign countries when we can't even serve our own?
- I would like the whole area of the treatment of dairy cows and their calves investigated by groups who will be impartial and honest.
- I regret that we as a Nation are as dependent as we are on the dairy and meat industries. I believe there is a worldwide shift underway in which people are asking for a) better treatment of animals who form the products of these industries and b) more cruelty free alternatives for food and clothing.
- Why shouldn't a different way of thinking allow business and compassion to be bedfellows?
- **223 SAFE:** SAFE, in principle, opposes the exploitation of animals for human gain. Inevitably, SAFE will be opposed to all forms of dairy farming. However, SAFE understands that codes of welfare are written in a context of animal welfare, not animal rights. For the purposes of this submission, SAFE is willing to engage in a dialogue about enhancing animal welfare, but notes that nothing in this submission is indicative of SAFE's policy. For instance, from SAFE's perspective, it is not possible to "own" an animal, but the term "owner" is used here for the sake of clarity.

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Treatment of calves(and cows) on dairy farms including killing using blow to the head is: needless, inhumane, barbaric, cruel, brutal, immoral, counter to our clean green image, bad for exports, outdated, brutally violent, not the right way to treat babies, agonising, horrible, reflects badly on the person doing it, not the way you would like your cat or dog treated, not right, pure evil, all about the money, pure greed

- It seems uncanny to me that in a First World country like New Zealand, with our clean, green image, it is still legal to bash baby cows over the head with blunt objects on farms. If this was done to a cat or a dog that was unwanted, we could prosecute the offenders with animal cruelty. The mere fact that this is happening on a dairy farm does not reduce or take away from this utterly barbaric practice. It must absolutely be forbidden. Death - as undesirable as it is - must be swift and painless. The animal does not deserve to suffer for any period of time, especially when it is already giving its life for human consumption.
- Discussion among my friends and family indicates a high degree of concern about this matter with several of us feeling that the only ethical course of action is to go completely 'dairy free' if this issue is not resolved properly.
- By supply and demand we are responsible to at least enforce legislation that reduces this suffering as much as we can. Blunt force is cruel and has an extremely low "one strike" success rate, inflicting unspeakable pain and horror to these young calves.
- Death can come to an animal in far less violent ways and the people of our country do not need to be employed carrying out acts of violence for money.
- Although I am a vegetarian, I do believe humans are meant to eat meat. I always believed that sheep and cows had a reasonable life, however after the recent exposure of how dairy calves are killed, my beliefs have been challenged.
- The dairy industry has treated the cows and calves with little respect for years-the docking of cows tails, the aborting of calves for earlier milk production,long walks to the milking shed and tearing away the male calves at birth for the bobby calf industry. Its bad enough the female calves are torn away and fed from artificial feeders in sheds.
- The sort of people that are capable and used to holding a blunt object and smashing it into the skull of a living creature are not the sort of people I want walking the same streets as my friends and family!
- In fact, when Euan McDonald was brought to trial, evidence that he killed calves with a hammer was used by the prosecution to portray him as a malicious cold blooded killer. So, if the NZ government is not willing to ban this barbaric practice then what does it say about it.
- The Misery, Suffering, Disease, Pain, Agony and Terror Inflicted on Animals is an Abomination and Genocide.
- This one is for my brothers in the dairy industry. Can't we see we need to evolve and deal with things more peacefully? These animals have feelings just as we do and the messages we are sending our youth do not serve us long term.
- The killing of over a million calves each year by farmers is probably a transgression of the Animal Welfare Act.
- To be quite honest if I knew New Zealand was like this I would have never moved here in the first place.
- We also worry about the impact of killing in such a violent way on the person doing it. It does not speak well of a person that they can inflict such violence on a living creature.
- After 60 years of being a dairy food consumer I can't believe I was so ignorant about what occurred in the industry. I have now decided to

215, 216, 217, 218, 219, 220, 223, 225, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 251, 252, 253, 254, 255, 256, 257, 258, 261, 262, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 277, 279, 284

go vegan as I cannot support this cruel practise. I will actively be encouraging friends to join me.

- none of this should EVER be acceptable to any of us here in NEW ZEALAND or in fact the WORLD so I am sending this message to you to tell you this is “WRONG” and you need to change laws now not in 1 or 2 years time to protect all Animals here in NEW ZEALAND .
- Craig Johnson from Massey University in Palmerston North concluded in his study from 2009 that brain signals in calves have shown that they do feel pain when slaughtered. Can you imagine being taken away from your mother at birth and being bludgeoned to death?
- I feel like I'm talking to a big-headed 10 year old kid who's taken to bullying innocent little nerdy kids at school. Sort yourself out and put a stop this crap. It's unethical, unintelligent and unnecessary.
- The idea that New Zealand can pride itself on "clean and green" while hiding the dirty little secrets of our dairy industry is disgusting. It degenerates us to the level of a base, unintelligent society who allows ignorance to the feeling and awareness these animals have.
- Anyone involved in the NZ dairy industry should be concerned about their woeful reputation when it comes to animal welfare - it's time to stop seeing a bobby calf as nothing more than waste. NZ dairy should hang their heads in shame.
- These are creatures capable of thinking and feeling pain, who do not deserve to endure a painful, cruel death simply because they are born the 'wrong' sex.
- Yes, they are cows and yes, they do feel pain and fear and they do love their babies!!!
- This treatment is not only barbaric and cruel, it is also totally unnecessary and should be stopped immediately and indefinitely.
- New Zealand likes to depict itself to the rest of the world as being clean and green with happy dairy cows feed on grass. However, the reality behind the dairy industry is such that it is time light is shone onto it to show just how grimy and disgusting it really is. We are sure if people overseas knew what was going on here they would be appalled.
- should we allow dogs, cats and yes even unwanted children to be bludgeoned in this manner, I think not
- Has anyone explained to farmers that we live in the 21 century? Societies are judged by how they treat their most vulnerable.
- I feel very strongly that the (mis) treatment of newly-born calves to milk cows in our burgeoning dairy industry be addressed
- I hope you will listen to the voices of ordinary people like myself who are deeply upset by the knowledge that calves can be killed through methods that are violent, and likely to cause pain and suffering. Yes, these voices will be inflected by emotion; which is something that some sectors of business and government prefer to denigrate when those emotions don't support rationalist arguments.
- Please make New Zealand a good example for the rest of the world to follow. Let's be the leaders of animal care and farming methods. Let us blaze that trail and see what positive publicity arrives as a result.
- The more one hears of how dairy cows are treated, the more one wants to give up dairy products altogether. Which is what I have done, along with several others. Now they want to put cows into crowded sheds on concrete floors, and deny the cows even the right to graze?
- Can you please take into consideration that food water and shelter is not sufficient for all animals?
- 223 **SAFE**: Calf induction is still performed in New Zealand. Although this may be outside the scope of the current review, SAFE takes this opportunity to note that it is a practice that must be addressed.

<p>1, 46, 48, 89, 191, 204, 205, 207, 226, 242, 264, 275</p>	<p>Suggestions for alternatives to blunt force</p> <ul style="list-style-type: none"> • Please consider other options. Euthanasia recently replaced gas chambers or dogs in Wanganui and was found to be a cost efficient alternative. Perhaps we can adapt the same approach. • The island where I lived before had dairy farms. The calves were put down by vets or people would get a chance to give them a loving home. • why can't they use a gun to make it quick and painless? • It is better for dairy cows to be given the hormone that brings them into milk. • Then when a cow needs to be put down, it should be done so by a method that does not involve blunt force instruments. Perhaps a better alternative would be an injection, in the same way we would prefer our pets to be put down when needed. We should not distinguish the ways we treat different species – they all deserve to be treated with compassion because this is their planet too. • It is bad enough that these calves are killed, but if they must be, let the vet put them down by humane injection. • Is it at least possible that farmers could use a stun gun (as at meatworks) to render the baby immediately unconscious before it is brutally attacked? • Where it is absolutely inevitable to kill an animal it should be done by euthanasia in the most human way possible!!! • They could be reared for meat later on in life. • These animals deserve to be handled humanely and only terminated under veterinary guidance by acceptable methods and with as little stress as is possible. • I submit that an independent investigator, for example, veterinary surgeon, should be tasked with addressing the issue, as I believe that traumatizing calves by transporting them to slaughter houses where they may or may not receive stunning prior to slaughter, is no better option. Professional home kill solutions should be considered. • 275 Federated Farmers recommends that the option of using a lethal injection to routinely kill calves be included. 	
<p>48, 98, 175, 186, 192, 276</p>	<p>Enforcement</p> <ul style="list-style-type: none"> • I also hope that once this change is made is that there will be some sort of procedure to ensure farmers are sticking to the new legislation. • please i implore you in the name of all thats holy to make it illegal to destroy calves in this manner and not only that but to actually bother to enforce it! cant trust the govt theyre all 2 faced hypocrites • I would also urge the government to put into place appropriate monitoring procedures to make sure the code of welfare is being followed by all animal producers. • If unwanted calves must be put down (which is an awful situation in itself), then it must be in a humane manner, and it should be a well regulated part of the industry that is regularly audited to ensure that correct methods are being used. • Please ensure that legal obligations include all the above aspects, and that everyone is held responsible for their actions, enforceable and punishable by law as unfortunately this is one of the only ways to change the numerous bad animal welfare and farming practices in New Zealand. 	

	<ul style="list-style-type: none"> 276 Berakah Farms The changes to the code we agree with provided they are more specific and directional to what is acceptable practice on New Zealand Dairy Farms. Training and support by the wider dairy industry and MPI to ensure these changes happen and are both communicated to dairy farmers .When the release of the 2010 Dairy Cattle Code was released the specific changes were not well communicated to Dairy farmers and they carried on with past practices that are no longer acceptable. 	
56, 60, 106, 178, 276	<p>No excuse that a blunt instruments are easier</p> <ul style="list-style-type: none"> It is no excuse that a blunt instrument is all there is to hand in out-of-the-way properties. NZ farmers should step-up and move away from this barbaric practice. It is a farmer's responsibility to have a rifle on hand for emergency killing. There are always kinder methods to use instead of cruel measures which are only employed as they are cheap or quick. Why be inhumane for the sake of laziness? 276 Berakah Farms Most times its only a matter of minutes to go and get the rifle or take the calf to our designated killing area as we are down the farm we a vehicle. Having a system in place on farm to deal with humane destruction, being designated killing area close to where firearms are securely kept and where the slink collectors pick up the dead calves , and a safe area to hold the calves help us manage the process. 	
222	<p>Scientific Justification</p> <p>VCNZ: VCNZ appreciates the reasons why NAWAC is proposing these changes, and agrees that blunt force trauma is unacceptable for routine killing of calves.</p> <p>However, VCNZ also notes NAWAC's advice that it is required to take into account of (amongst other things) "scientific knowledge" before recommending a code of welfare to the Minister for issue and that in practice NAWAC does not necessarily complete this consideration prior to public consultation.</p> <p>VCNZ would therefore be interested in sighting the "scientific knowledge" underpinning NAWAC's proposals when this work is completed.</p>	
45, 50, 51, 65, 70, 78, 82, 139, 140, 188, 189, 190	<p>Links</p> <p>It is scientifically irrefutable that cows are sentient making them capable of experiencing pain, avoiding it and seeking comfort. All mammals would find being "bashed with a blunt object" agonizing. There are countless studies done on this:</p> <p>http://www.animal-rights-library.com/texts-m/singer03.htm</p> <p>http://agriculture.de/acms1/conf6/ws5apain.htm</p> <p>http://www.grandin.com/inc/animals.in.translation.ch5.html</p>	
92	<p>Dr. Temple Grandin, the world's foremost authority on farm animal welfare (and an authority who NAWAC has cited repeatedly) writes that "manual blunt force trauma is currently [only] an acceptable means of euthanasia for piglets 5kg (12lb) or under, infant lambs under 9kg (20lb), infant kids 7kg (15lb) and poultry (chickens and turkeys)." Temple Grandin, "Recommended On-Farm Euthanasia Practices," Improving Animal Welfare: A Practical Approach, p. 202 (CABI, 2010). And she emphasizes that "manual blunt force trauma is not an acceptable means of euthanasia for cattle." Id. (emphasis in original). NAWAC should at least bring its standards up to those that Dr. Grandin considers minimal acceptable standards.</p>	

131	<p>DAIRY: THE MILK OF HUMAN MALEVOLENCE</p> <p>WWW.GOVEGAN.ORG.NZ</p> <p>WWW.VEGANSOCIETY.CO.NZ</p> <p>WWW.PCRM.ORG</p> <p>WWW.GENTLEWORLD.ORG</p> <p>WWW.WHALE.TO</p> <p>WWW.NZAVS.ORG.NZ</p> <p>WWW.COK.COM</p>	
218	<p>It is scientifically irrefutable that cows are sentient animals which experience pain. All mammals would find being "bashed with a blunt object" agonizing. There are countless studies done on this:</p> <p>http://www.animal-rights-library.com/texts-m/singer03.htm</p> <p>http://agriculture.de/acms1/conf6/ws5apain.htm</p> <p>http://www.grandin.com/inc/animals.in.translation.ch5.html</p>	
280 DairyNZ	<p>DairyNZ strongly supports the maintenance of an evidence based, outcome focused, under-pinning for New Zealand's codes of welfare. In assessing the appropriateness of the proposed changes we have compared them to the recommendations of the AVMA Guidelines for the Euthanasia of Animals (2013 Edition), (https://www.avma.org/kb/policies/documents/euthanasia.pdf) and those of the Humane Slaughter Association (http://www.hsa.org.uk/shop/publications-1/product/humane-dispatch-and-disposal-of-infant-calves-(free-pdf)).</p>	

Specific Comments

Section	No.	Comment	NAWAC Response
Section 5.10	60	I recommend section 5.10 of the code to be amended to read: Calves are not to be removed from their mothers and are not to be killed.	
	222 VCNZ	<p>While VCNZ agrees with the proposed changes to this section of the Code including the new proposed minimum standards, it suggests that the fifth paragraph in the Introduction section be amended to read “Blunt force trauma must not be used for the routine, planned humane destruction of unwanted calves”.</p> <p>The proposed changes will bring New Zealand into line with international standards, which include EC Directives, OIE Standards, IDF Guidelines, HSA/UFAW, EFSA and FAWC reports and sections S3.2.2.4 and S3.2.2.5 of the American Veterinary Medical Association’s (AVMA) Guidelines for the Euthanasia of Animals: 2013 Edition. These sections state that it is unacceptable to use manually applied blunt force trauma to the head of cattle and calves. It further states that blunt force trauma is “not acceptable for calves because their skulls are too hard to achieve immediate destruction of brain tissue leading to unconsciousness and death. Manually applied blunt force trauma is also difficult if not impossible to apply consistently because of the degree of restraint required and complications in positioning calves...for conducting this procedure”.</p>	
	223 SAFE	<p>SAFE supports the intention of the changes to this section.</p> <p>7. Section C states that “calves that are killed must be rapidly rendered insensible and remain in that state until death is confirmed.” This is a clear improvement on the existing code. However, it is unclear as to what qualifies as “rapidly rendering [a calf] insensible.” SAFE requests that an explanatory note is added, outlining how a court is to be satisfied that the obligations of this section have been met.</p> <p>8. Section D requires that persons undertaking euthanasia must be suitably trained and competent in the handling of calves. This is an improvement on the existing code, and SAFE supports it. There is some question as to what qualifies as suitable training and competency.</p> <p>9. Section E prohibits the use of blunt force trauma, except in emergencies. This is an improvement on the existing code. SAFE supports this addition, with some reservations as to what qualifies as an emergency – outlined below.</p> <p>10. Section F requires that calves must be cared for until a contractor arrives. This addresses the issue of delays affecting contractors, and ensures calves will continue to be cared for. However, a farmer still has a responsibility to ensure that whichever contractor they select still treats the calf appropriately. The farmer (as the owner) and the contractor (as the person in charge of the animal) share a joint responsibility for ensuring the calf is looked after, in accordance with Part 1 of the Animal Welfare Act. As written, minimum standard 17(f) implies that an owner is exempt from responsibility after the arrival of the contractor, which is likely contrary to NAWAC’s intention. SAFE requests that a clarification is added, that the use of a contractor does not exempt the owner of an animal from any responsibilities under the Act.</p>	
	250 ACT	<p>To the proposed amendment and more especially MS 17 (e)</p> <p>I had always thought using a captive bolt to dispatch animals was in fact imparting a blunt force trauma. So the question for NAWAC to carefully consider and respond to is whether they know of scientific research or evidence to show any physiological variance between blunt force trauma methods, routine or otherwise”? Surely that is a prerequisite for this discussion but it is not apparent in the online document.</p> <p>From my current reading of the proposal and with the previous paragraph in mind could it be construed that NAWAC is creating a space for easier prosecutions on welfare grounds. I would hope that is not the case.</p>	

<p>275 Feds</p>	<p>5.10 Calf Management:</p> <p>2.2. Federated Farmers submits that farmers must be free to manage excess stock in a way that suits their business without compromising the welfare of the animals. Where a farmer chooses to euthanase calves on farm, the method must be humane.</p> <p>2.3. The Code has until now been silent on non-emergency killing of calves and Federated Farmers welcomes Standards being set to manage this.</p> <p>2.4. Federated Farmers agrees with banning the use of blunt force trauma as a method of killing calves in non-emergency situations.</p> <p>2.5. Killing by any method requires great skill to achieve a rapid death, and no method is perfect, every time. The Federation notes the Code recognises this as a skill which must be learnt and we agree.</p> <p>2.6. Many farmers are highly skilled at killing a calf quickly and cleanly, having learnt the best way through generational farming. However, it is not a job for anyone and no person should be forced to carry out this procedure.</p> <p>2.8. Where there is no suitable person, a veterinarian or another farmer may be available to humanely kill the calf. Contractors may also be available in the district to manage the process.</p> <p>The proposed methods give only two recommended options – shooting or captive bolt stunning. Federated Farmers recommends a third option be included: lethal injection, which must be administered by a veterinarian and any food safety residues managed. This option must be included as a recommended best practice.</p> <p>2.10. No matter which method is used, death must follow swiftly and it is necessary that death is confirmed before leaving the animal. Therefore, Federated Farmers recommends the following changes be made to paragraph 4 in the Introduction in s 5.10, with the additions underlined and deletions crossed out:</p> <p><i>2.11. <u>Shooting, or captive bolt stunning or lethal injection</u> are recommended methods to routinely kill unwanted calves. All techniques require death to be confirmed. Captive bolt stunning on its own will not always cause death in calves and must be followed up by the farmer checking that death has occurred and where needed, employing a secondary method to ensure the calf dies (see section 6.4 for information). Death is confirmed when there are no signs of regular, rhythmic breathing, no sign of heartbeat, no jugular pulse visible in the neck, and the eyes are fixed with dilated pupils.</i></p> <p>2.12. Federated Farmers notes the recommendations for best practice includes the signs of life, with no advice on any follow-up method should the animal still be alive. Federated Farmers commends this, as the secondary method chosen will depend on farm circumstances and the person's skill.</p> <p>2.13. While it is considered by some that bleeding out must follow captive bolt gun use or where the animal has not been killed outright, Federated Farmers submits against this being recommended as best practice.</p> <p>2.14. Cattle are very sensitive to the smell of blood, causing them to act unpredictably, endangering themselves, animals around them, farm staff and damaging their environment. Therefore, bleeding out of unconscious calves must be done well away from the paddock, the milking shed and the lanes along which cows walk regularly. This may be impracticable for some farmers to do as the calf pens may be close to where the cows normally pass by, the paddock may be routinely used and the smell of blood lingers.</p> <p>2.15. Bleeding out also degrades the quality of the pelt. Some farmers sell these carcasses to slink skin operators.</p> <p>2.16. Pithing the brain is difficult and requires great skill.</p> <p>2.17. Federated Farmers submits that the options for making sure the calf is dead be one for each farmer to make, based on their skill level, and not stipulated within the Code.</p>	
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		<p>Amendment of minimum standard 17d to read persons undertaking euthanasia must be suitably trained in the handling and killing of animals, and in the assessment of death</p> <p>h) Amendment to minimum standard 17f to read Calves that are unwanted must be cared for as if they were to remain part of the herd until they are destroyed</p>	
	281 DCAN Z	<p>DCANZ supports stipulation of shooting or the use of a captive bolt as the recommended best practice for euthanasia of calves. DCANZ suggests that pithing be added as an appropriate secondary method option, alongside re-shooting and cutting the throat for bleeding-out. DCANZ agrees with secondary methods being applied, where necessary, after checking the effectiveness of the primary method.</p>	
	283 MIA	<p>MIA recommends that the minimum standards for stunning, stunning to bleed out and personnel competency in the dairy cattle code for humane slaughter be equivalent to the minimum standards prescribed in the commercial slaughter code of welfare and that these cover all dairy cattle with appropriate exceptions for emergency euthanasia.</p> <p>16. The MIA submits that there is inconsistency in the use of some terms within the proposal. Examples (with recommended term in brackets) are:</p> <ol style="list-style-type: none"> a. Slaughtered, killed, destroyed, destruction, (euthanasia) b. Rendered insensible, (stunning). c. Blunt force trauma, (blunt force). <p>17. MIA notes that the principles and standards for euthanasia in each of the sections, 5.10 Calf Management and 6.4 Emergency Humane Destruction, are essentially the same and furthermore the definition of dairy cattle under section 1.3 includes calves.</p> <p>18. There is an argument that premature calves could be treated as an emergency euthanasia situation and therefore minimum standard 17 (a) should be incorporated into minimum standard 20.</p> <p>Proposed Minimum Standard 17 (f) refers to contractors and MIA notes that the requirement is relevant irrespective as to whether or not contractors are used for the euthanasia.</p> <p>23. MIA recommends that proposed Minimum Standard 17 (f) is reworded as follows: When routine euthanasia is carried out, the persons in charge, including contractors, must ensure that the dairy cattle (including calves) are cared for as if they were to remain part of the herd <u>until the time of euthanasia</u>.</p> <p>MIA also notes that under section 1.2 of the code the owner may place dairy cattle in the care of others for purposes such as (amongst others) slaughter and the responsibility for meeting minimum standards during the operation of particular tasks lies with the person responsible for carrying out that particular task.</p> <p>26. The implication of this is that a slaughterman at a meat processing premises is covered by this code which requires confirmation of death immediately and then again 3-5 minutes later.</p> <p>27. MIA submits that this is not a requirement in the commercial slaughter code, is impractical in a meat processing premises and that meat processors have other systems in place to ensure death.</p> <p>28. MIA recommends that the confirmation of death be required for all dairy cattle (including calves) outside of a controlled slaughter environment such as a meat processing premises.</p> <p>29. The proposed code, requires for death to be confirmed, that there is; no signs of regular, rhythmic breathing, no sign of heartbeat, no jugular pulse visible in the neck, and the eyes are fixed with dilated pupils.</p> <p>30. MIA submits that not all these tests are absolute and are difficult, and at times impossible to detect even for a professional. An animal that is still technically alive (and still capable of sensation) may have very low blood pressure and therefore shallow respiration, no jugular pulses and irregular and/or weak heartbeat.</p>	

		<p>31. MIA is advised that for confirming death – the corneal reflex is the “gold standard”. This method is to touch the eyeball (not the eyelid) and if the animal does not blink it is dead. This check is very easy for anyone to do and requires no extra equipment e.g. stethoscope (for heartbeat).</p> <p>32. MIA recommends that the corneal reflex method is used for the confirmation of death. The proposal recommends captive bolt stunning as a recommended method of euthanasia for calves and for stunning of dairy cattle. MIA notes that technically, captive bolt is a blunt force instrument, especially the mushroom head nonpenetrating bolt.</p>	
	284 Voiceless	<p>Voiceless supports the insertion of text into the introductory comments, in particular noting the phrase: “Blunt force trauma is not considered acceptable for the routine, planned humane destruction of unwanted calves.”</p> <p>3.2 Voiceless also supports one of the new proposed minimum standards: (f)</p> <p>3.3 Voiceless recommends additional components to the following two proposed minimum standards: “(c) Calves that are killed must be rapidly rendered insensible and remain in that state until death is confirmed.” As previously noted, the guidelines must call for an immediate second procedure in the event that calves are not instantaneously killed. There is evidence that killing methods are not consistently effective and in reality there may be many instances where calves are not rendered insensible until the point of death. To protect calves from prolonged suffering, minimum standard (c) must further mandate a second procedure to rapidly render a calf insensible where the first method was ineffective. The stipulated threshold - ‘suitable training and competence’ – is overly subjective. Voiceless respectfully submits that persons undertaking euthanasia must have formal training and be appropriately accredited / certified. Such a standard would necessitate the implementation of an official training and authorisation / accreditation scheme, with this scheme being expressly stipulated in the Code. Voiceless Highly recommends such a procedure.</p> <p>3.4 Voiceless opposes the remaining proposed minimum standard and recommends it be omitted: “(e) Calves must not be killed by the use of blunt trauma except where necessary in an emergency, as referred to in section 6.4. Blunt trauma must not be an accepted method of killing in any circumstance, even in emergency situations.</p>	
Section 6.4	60	I recommend section 6.4 of the code to be amended to read: In an emergency where an animal is suffering such that its like must be ended, death by shooting or humane injection are the only acceptable methods.	
	103	I would also note that the use of the term “euthanasia” in the consultation document (http://www.biosecurity.govt.nz/files/regs/animal-welfare/animal-welfare-dairy-cattle-code-of-welfare-2010-calf-amendment.pdf) is euphemistic to the point of inaccuracy. The Oxford English Dictionary defines euthanasia as “a gentle and easy death”. I doubt anyone would consider death by gunshot to fall into this category, if facing their own death.	
	222 VCNZ	<p>6.4 Emergency Humane Destruction</p> <p>VCNZ supports the proposed changes to this section of the Code, but considers that, if the exemption for emergency situations is to remain, greater clarification is required around when manually applied blunt force trauma might be considered acceptable.</p> <p>Without a clear definition of what constitutes an emergency situation there is a real potential for this exemption to be interpreted in a very broad way. VCNZ also considers that, if manually applied blunt force trauma continues to be permitted in such situations, then clear requirements are needed around what instruments are acceptable, where and how the animal can be struck and the competency of the operator.</p>	
	223 SAFE	<p>SAFE notes once again that the primary function of a code of welfare is to act as a defence in the event of a breach of the Animal Welfare Act. In the event that a truly extraordinary situation arises, and it is a genuine emergency, any farmer that follows the most humane course of action is not subject to prosecution under the Animal Welfare Act. As such, it is unnecessary and redundant for NAWAC to provide protection to farmers in such an emergency.</p> <p>By introducing an emergency clause, NAWAC only creates a risk that the clause will justify inhumane destruction of calves in what could only be tentatively classified as an emergency. If such a clause is used, SAFE wishes to raise the following issues.</p>	

	<p>12. It is a concern that it is not entirely clear as to what qualifies as an emergency. SAFE notes that the explanatory section explains that it is meant to be used when additional suffering would result if an emergency method is not used. However, SAFE fears that there may be some ambiguity as to what qualifies, and has some suggestions for improved clarity, below.</p> <p>13. The additional requirement of confirming death is an improvement upon the previous code. It is not entirely clear as to what qualifies or does not qualify as rapidly rendering an animal insensible, and SAFE recommends including guidelines as to what is considered acceptable. It should be explicitly stated that the animal must be rendered insensible by the most rapid means available, and that inadequate training is not a justification for failing to do so.</p> <p>14. The additional requirement that persons undertaking emergency humane destruction must be suitably trained in addition to being competent is an improvement on the previous code. SAFE supports it, but notes that there is still a question as to what qualifies as suitable training and competency.</p> <p>Definition of Emergencies</p> <p>15. It is all too easy for a person in charge of an animal to claim that a situation was an “emergency” in hindsight. For the sake of the courts, the people in charge of animals, and for the animals themselves, clear guidelines are needed.</p> <p>16. An emergency must be unforeseeable. For instance, a farmer performing calf induction could make a case that the calves killed under minimum standard 17(a) qualify as an emergency, as the calf in question would undoubtedly be suffering. However, this situation could easily be prevented by the farmer in question carrying the appropriate equipment during calving. Even if induction is eventually banned, it is likely that calves will still be routinely killed under section 17(a). A farmer should always have appropriate equipment on hand near cows that are close to birthing.</p> <p>17. An emergency clause should not grant protection to farmers that are neglecting their animals. For instance, if a farmer allows calves to starve, the farmer should not qualify for protection under the code for humane destruction of the calf. The farmer should be subject to prosecution of both the treatment of the calf, and the painful death that it has to endure as a result of that mistreatment.</p> <p>18. A situation can only qualify as an emergency if the animal is currently and obviously suffering, to a degree that it would be more humane to use the limited options on hand. For instance, a person in charge of an animal might run out of food for their calves, and decide that they must all be euthanised to prevent starvation. It could be argued that this qualifies as an “emergency,” as it prevents greater suffering in the long run. This would exempt the killing from the prohibition of blunt force trauma, as the standards are currently written. SAFE requests that it is clear that the emergency clause is never to be applied to a healthy animal.</p> <p>19. The existence of an emergency clause carries with it an obligation for farmers to take precautionary actions to avoid them occurring. Any person in charge of an animal must have appropriate euthanasia equipment on hand at all times where there is a reasonable chance that an emergency situation will arise. This should include, but not be limited to, calving season and general inspection of stock.</p> <p>20. SAFE acknowledges that truly extraordinary circumstances do arise from time to time. A calf may escape and be hit by a car, and require immediate action in a situation where appropriate equipment is not on hand. A firearm may fail to fire so other means must be utilised. It is likely that these situations would not qualify for prosecution under the Animal Welfare Act, and thus do not require an emergency clause.</p>	
<p>275 Feds</p>	<p>Minimum Standard No. 20 - Emergency Humane Destruction: Emergencies happen anywhere on farm, where sick and injured stock need to be put down quickly and the quickest and most humane method may be blunt force trauma.</p> <p>2.19. Some calves are born that need to be put down straight away due to a deformity or an accident at birth, and when these occasions occur away from the farm shed, the quickest and most humane method may be blunt force trauma.</p> <p>2.20. We appreciate that NAWAC has recognised this by proposing blunt force trauma be available in emergencies. The alternative is for farmers to carry a weapon every time they go around the farm, which is not a sensible precaution.</p> <p>2.21. Again, Federated Farmers commends NAWAC for acknowledging that emergency slaughter is a skilled operation.</p>	

	276 Berak ah Farms	(2) 6.4 INTRODUCTION 2nd Paragraph Ended as soon as possible and followed with throat cutting to ensure death.	
	280 Dairy NZ	Specifically we request: The differentiation of emergency euthanasia measures from management of routine euthanasia for unwanted calves. This recognises that though farmers can plan and prepare for events on farm, the practical reality is that in some cases emergency measures need to be taken to manage animal welfare. e) The clear stipulation that persons undertaking euthanasia must be suitably trained and competent in the handling and killing of calves/cattle. Addition of advice in section 6.4 on how to assess whether an animal has been 'rendered insensible'. We suggest a practical definition that describes: i. immediate collapse of the animal, along with a period of intense muscle contraction of up to 20 seconds. ii. followed by relaxation of the body which is often accompanied by poorly co-ordinated paddling movements, and at this stage the pupils of the eye should be totally dilated. iii. No regular or rhythmic breathing, no blink reflex upon touching the eye and no attempt by the animal to raise its head. Addition of a definition for emergency. We suggest: Emergency situations are defined as sudden, urgent situations that are unexpected and require immediate action to be taken to alleviate suffering	
	281 DCAN Z	DCANZ supports maintaining the ability for farmers to use blunt force in an emergency situation. This notes that situations can arise where suffering is such that an animal's life must be ended as soon as possible, and where none of the recommended methods are readily available.	
	283 MIA	The MIA recommends that section 5.10 Calf Management be simplified and exclude euthanasia; and that 6.4 becomes a section on Humane Euthanasia for dairy cattle (including calves). 20. The MIA further recommends that 6.4 and the associated minimum standards be split into two –one for routine and one for emergency euthanasia; and as per paragraph 38 below, it is essential that there is a very clear definition of when emergency euthanasia is permitted. 21. This would simplify the code for the users, by having all the information together such as recommended methods, death confirmation parameters, distinction between routine and emergency euthanasia, etc. Section 6.4 of the proposed code outlines an emergency situation and refers to approved methods (for euthanasia). 37. MIA notes that while there are a number of outcomes required/recommended, there are no approved methods (or references to such) within the code. 38. MIA recommends that the clarification for when blunt force is allowed be re-written to; In an emergency situation where an animal's life must be ended immediately, non-humane methods of euthanasia may be used where the suffering is assessed to be greater than that, that would be incurred by the method of immediate euthanasia. 39. Section 6.4 of the current dairy code of welfare requires that: a. "Humane slaughter.....can be achieved by causing sufficient brain damage to render the animal insensible and then cutting the major blood vessels of the neck to cause death". b. "any animal subject to captive bolt or concussive stunning also needs to be bled out immediately after stunning ...",	

	<p>c. "All dairy cattle should be bled out as soon as possible after they have been rendered insensible", and</p> <p>d. "...killing any dairy cattle by cutting the throat may not produce rapid death".</p> <p>40. MIA submits that research has shown in 25% of young calves a thrombus (clot) will form in the vessels in the neck and blood will still be delivered to the brain via the vertebral artery (particularly in calves as they have an additional connection between the carotid and the vertebral arteries).</p> <p>41. In addition depending on the placement of the captive bolt, results can be variable and for calves death is not ensured.</p> <p>42. MIA strongly recommends that due to the anatomy of cattle, in particular young calves, and that to ensure a rapid death, that minimum standard 20 includes the need to bleed animals out as rapidly as possible by cutting the carotid arteries/jugular veins and a thoracic stick, rather than just cutting the neck.</p> <p>43. MIA notes that cutting the carotid arteries/jugular vein and applying a thoracic stick is not a straightforward process, so competency is essential.</p> <p>44. The proposed changes in the code recommend that "If signs of life are seen, animals should be re-shot (if using a firearm) or have the neck cut to ensure death".</p> <p>45. Notwithstanding the recommendation in paragraph 42 above, MIA recommends that if signs of life are seen, animals should be re-shot (if using a firearm) or a thoracic stick used to ensure death.</p>	
<p>284 Voicel ess</p>	<p>Voiceless opposes the following insertion of text into the introductory comments and recommends omission:</p> <p>"Blunt force may only be used in an emergency situation where the suffering is such that an animal's life must be ended as soon as possible, and none of the approved methods are readily available."</p> <p>As outlined throughout this submission, blunt trauma is not an acceptable method of killing, even in emergency situations.</p> <p>3.6 Many guides only permit blunt trauma on calves less than 24 hours old. This factor is not mentioned in the Code's provision that blunt trauma may be used in emergency situations. Although Voiceless opposes the use of blunt trauma in any situation, the Code should at the very least restrict the use of blunt trauma in an emergency situation to calves that are less than 24 hours old.</p> <p>Voiceless recommends that if blunt trauma is used in emergency situations, a 'follow---up' procedure is also required.</p>	