

Summary of public submissions

| Summary of public submissions of draft Animal Welfare (Deer) Code of Welfare 11 December 2004 | | | |
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| Section or minimum standard | Submitter | Submission | NAWAC response |
| General comments | 1 | Code is practical and appropriate and DINZ wholeheartedly supports code with the suggested alterations. | Noted |
| | 2 | In general, contents are relevant, useful and comprehensive | Noted |
| | 4 | <p>1. Too much detailed information making it the code clumsy and impractical as a working document. Concerns about how it would be perceived internationally. Needs to be simplified.</p> <p>2. Keeping of deer in enclosed properties for the purposes of recreational shooting falls outside the definition of hunting and NZVA wonders if this code is designed to cover these animals?</p> | <p>Noted</p> <p>Code does cover game estates/ safari parks.</p> |
| | 5 | Generally satisfied with the draft and with a few commonsense changes, it will be a practical working code. | Noted |
| | 6 | Supports draft code – is common sense and good farming practice | Noted |
| | 7 | Approach taken is practical and appropriate although concerns about some minimum standards. Member's views varied from appropriate and many of the standards comply with existing requirements for | Noted |

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| | | <p>accreditation to standards being too high. Productivity is considered to be an important aspect of good practice. Adverse effects on animal productivity and farmers' profitability must be given appropriate weighting when considering Minimum Standards as reduced profitability can have a detrimental impact on ongoing animal welfare. M/s need to be practical and unambiguous.</p> | |
| | 8 | <p>With the exception of comments on 3 minimum standards, Assoc is strongly supportive of code, is sensible and practical, and addresses deer welfare. Initially thought too long but now think code is complete and comprehensive which will ensure industry is enhanced and farm productivity and industry image advanced.</p> | Noted |
| | 9 | <p>Impressed with the intent and believe that the majority of deer farmers are meeting the minimum standards. Clearly set out and all deer farmers will be able to find something in code to improve their farming business.</p> | Noted |
| | 10 | <p>General support for code, and is practical. Will assist farmers in meeting adequate conditions for deer.</p> | Noted |
| | 11 | <p>Code does not cover velvet removal. Velvet removal is motivated largely by financial returns. Removal of live sensitive tissue is unprecedented in western livestock farming. NAWAC needs to consider the ethics and welfare of velvet removal. Velvet removal should be restricted to breeding sires.</p> | Velvet removal will be dealt with in a separate code. Points noted and will be considered when NAWAC considers reviewing the velvetting code. |
| | 12 | <p>Acknowledges the extent of the preparatory work in developing the code. Well researched and well prepared. Only a few areas of concern.</p> | Noted |

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| | 13 | The code should not apply to game estates, since deer are not farmed in the manner of a commercial deer farming operation. Deer are only handled/yarded for treatment for disease. Note the definition of game estate in s65(B) of the Animal Products Act which defines as a place where deer are kept as if in the wild. | Noted Legal opinion sought and confirmed that game estate animals would be covered by this code. |
| Preface | 1 | 4 th para, last sentence incorrect date, should be 2005 | Agree, amend to 2006 |
| Contents P3 | 1 | 5.3 Introduction as a title in correct Suggested title: Mixing of Deer | Agree, amend |
| Contents P4 | 1 | Appendix VI: Species of Farmed Deer Repeated reference here | Agree, amend |
| 1. Intro P5 | 1 | Commas in last paragraph insertion ...publication, making....Committee, which.... | Agree, amend |
| 1.4 Scope P6 | 1 | First paragraph to include subspecies ..(<i>Cervus elaphus</i> including various subspecies)... | Agree, amend to: “(<i>Cervus elaphus</i>), incorporating various subspecies such as elk or wapiti...” |
| 1.4 Scope P6 | 1 | Second paragraph: “...requires both experience...” Could be better worded to include how a new farmer gets to the greater level of experience, like: “requires a farmer to gain good knowledge, understanding, and....” | Agree, amend |
| 1.4 Scope P7 | 1 | First paragraph: comma insert ...circumstances, but.... | Agree, amend |
| 1.4 Scope P7 | 1 | Seventh paragraph incorrect date 2004 instead of 2005 | Agree, amend to 2004 |
| 1.8 Glossary P10 | 1 | Adult – AHB recognizes 1 January for birthdate Any deer over the age of 2 years (birthdates generally considered 1 December for practical reasons, however AHB regulations recognise 1 January to be birthdate for Tb purposes) | Noted, amend to “...(birthdates are generally considered to be 1 December, but Animal Health Board regulations recognise 1 January as the birth date for Tb testing purposes).” |
| 1.8 Glossary | 1 | ART | Agree, amend |

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| P10 | | Not used in text anymore so should be removed | |
| 1.8 Glossary P10 | 1 | Back Fencing - electric Electric fencing may or may not be used so have this word in brackets | Agree, amend to: “...using a fence, often electrified,..” |
| 1.8 Glossary P10 | 1 | Baleage Baleage is plastic wrapped so insert the word plastic “..plastic wrapped..” | Agree, amend |
| 1.8 Glossary P11 | 1 | BCS definition reference Appendix III may no longer apply if moved into Minimum Standard No. 1 | Disagree, leave as is |
| 1.8 Glossary P11 | 1 | Certified Velveter Would read better and be less confusing if removed the last words “and is qualified to carry...” | Agree, amend to: “A person who is approved to remove velvet under the contractual conditions of the National Velveting Standards Body formal certification scheme.” |
| 1.8 Glossary P11 | 1 | Chaser Stag terminology Remove the words “or backup stag or buck” | Agree, amend |
| 1.8 Glossary P12 | 1 | Crude Protein definition could be clearer Suggest: Crude Protein (CP): available proteins in feed that includes indigestible proteins | Disagree, leave as is |
| 1.8 Glossary P12 | 1 | DM -American spelling? Standardized = standardised | Agree, amend |
| 1.8 Glossary P12 | 1 | Finisher – “below” Reference referred to is not below so change to following | Definition deleted |
| 1.8 Glossary P12 | 1 | Game park / safari park definition Is not applicable as APA P25 defines these as “wild” animals and the terms are not used in the text of the code | Definition reworded to take into account “wild” |
| 1.8 Glossary P13 | 1 | Pecking Order – rewording Would read better if removed the word “position” | Agree, amend to: “...resulting from individuals establishing their dominance...” |

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| 1.8 Glossary P13 | 1 | Persistent Bullying - rewording Change the word "on" to "towards" to read better | Agree, amend |
| 1.8 Glossary P14 | 1 | Rotational grazing – rewording to widen meaning Can be whole pastures so remove "by strip" | Agree, amend but remove "...strip..." only |
| 1.8 Glossary P14 | 1 | Rut - rewording to make clearer "...risk to handlers and other deer..." | Disagree, leave as is in a Note |
| 1.8 Glossary P15 | 1 | Trophy Stag – is this term used in the text of the code? ".. stag or bull or buck" and remove last part of sentence "but destined.." | Delete as no longer used in code |
| 1.8 Glossary P15 | 1 | Velvetting definition "The humane act....." | Disagree, leave as is |
| 2.1 Legal Obligations P16 | 1 | First sentence could be worded clearer "The owner or person in charge has overall responsibility for the welfare of the deer held on farm" | Disagree, leave as is |
| 2.1 Legal Obligations P16 | 1 | 3(b) Release of deer Any release is illegal under Noxious Animals Act so suggest remove this | Disagree, leave as is |
| 2.1 Legal Obligations P16 | 1 | 3(c) include certified velvetter "... veterinarian or certified velvetter; or" | Disagree, leave as is |
| 3.1 Food P17 | 1 | Last paragraph: rewording " shifted more frequently in..." | Agree, amend |
| 3.1 Food P17 | 4 | Introduction. The 'good' in front of health and welfare in the first paragraph is redundant. | Disagree, leave as is |
| 3.1 Food P17 | 4 | Introduction In the 2 nd para, 'an individual or group of' should be replaced simply by 'deer' | Agree, amend |
| 3.1 Food P17 | 4 | Introduction The first bullet point (physiological state) is redundant as many of the following points are actually physiological states. | Disagree, leave as is |
| 3.1 Food P18 | 4 | 3 rd para | Disagree, leave as is |

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| | | Amend to ‘...by monitoring the body condition or regular liveweight and growth rate monitoring.’ | |
| MS No. 1 Food P18 | 1 | (a) rewording “..adequate daily...” | Agree, amend |
| MS No. 1 Food P18 | 4 | (a)(iii) ‘avoid’ should be replaced by ‘prevent’ | Agree, amend |
| MS No. 1 Food P18 | 1 | (b) insertion Agree that Appendix III should be included here. | Disagree. Remove reference to Appendix III |
| MS No. 1 Food P18 | 7 | Recommend delete reference to BCS as need to take into account variability in sizes of deer. Put into RBP or GI section and refer to as an Appendix. Suggest Minimum standard written as ‘ <i>If any animal shows emaciation immediate remedial action...</i> ’ | Disagree, because BCS is the only system that takes into account variability. Emaciation is ill-defined. |
| MS No. 1(c) Food P18 | 12 | Insert ‘promptly’ before ‘investigated’ as it is imperative that any signs of ill-health in fawns or weaners are investigated as soon as they are detected, as failure to do so could place many others at risk.. | Agree, amend |
| 3.1 Food RBP (b) P19 | 10 | Insert ‘loose’ before fencing wire, otherwise implication is that deer should not be held by fencing wire. | Agree, amend |
| 3.1 Food RBP P19 | 4 | (b) ‘Measures should be taken to prevent access’ except perhaps ragwort. | Disagree, leave as is |
| 3.1 Food RBP P19 | 1 | (c) further explanation “... period to allow rumen bacteria to adjust and to prevent...” | Agree, amend to: “...This will allow rumen bacteria to adjust and thus prevent...” |
| P19 (d) | 2 | It is very important to add a supplementary source of roughage (instead of should). Maybe provision of roughage should be a minimum standard? | Disagree, leave as is |
| 3.1 Food RBP P19 | 1 | (e) include more elements “... B1, sodium, calcium, and...” | Noted, amend to “...diets should receive appropriate dietary supplementation to ensure they maintain their levels of essential |

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| | | | vitamins and trace elements.” |
| 3.1 Food RBP P19 | 1 | (f) space in th ere | Agree, amend |
| 3.1 Food RBP P19 | 4 | (m) should be under Shelter? | Agree, amend Moved to recommended best practice of 4.1 |
| 3.1 Food RBP | 1 | (o) too many fullstops | Agree, amend |
| 3.1 Food RBP (l) | 12 | Should be a minimum standard, since there are a no. of recorded incidents of fatalities due to the ingestion of twine and wrapping | Disagree, leave as is Not practical |
| 3.1 Food GI P20 | 1 | (b) Remove this as is covered in MS No. 1 | Agree, amend |
| 3.1 Food GI P20 | 4 | (d) ‘daily intake demands are’ should be replaced with ‘daily intake is’ | Noted, amend to “...daily intake requirements are...” |
| 3.1 Food GI P20 | 1 | (e) insert new word for clarity End of last sentence to read: “..maintenance requirements.” | Agree, amend |
| 3.1 Food GI P21 | 4 | (h) this statement is disputed by the Deer Branch. What is critical is high energy diets in autumn so deer in good condition through winter, too hard to get high quality diets and improve condition of deer in winter itself (Deer Branch pers comm). | Noted, amend to “High energy and high quality diets are critical during autumn for winter survival.” |
| 3.1 Food GI P21 | 4 | (k) Deer Branch considers early weaning should only be considered after supplementary feeding has been used as the primary response in these conditions. | Noted, Rearrange sentences 2 nd sentence becomes first and add “If the...conditions persist, however, early weaning...” |
| 3.1 Food GI P21 | 4 | Deer Branch contends that salmonella is simply not found in NZ deer and there is only one paper worldwide on Salmonella in deer. | Agree, amend to: “...harmful bacteria and/or internal parasites, through contamination with faecal material.” |
| 3.1 Food GI P21 | 4 | Feeding management The 1 st para repeats the 2 nd para after the bullet pts on | Agree, amend Delete first para. Replace with |

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| | | p17 | “The following tables ...guidelines because there is considerable variation in pastoral feeding systems throughout New Zealand.” |
| 3.1 Food GI P23 | 4 | (b) ‘water’ should be replaced with ‘water intake’ to include water in the feed | Disagree, leave as is |
| P23 (a) & (b) | 5 | In most cases impractical | Assume relating to recommended best practice Disagree, leave as is |
| MS No. 2 P23* | 1 | Insert new minimum standard requirement ‘In excessively hot weather conditions, all classes of deer must have access to water so as to prevent heat stress’ as by experience deer drink water to mitigate heat stress and do not use any shade provided. Consequently remove MS No. 3(c). | Noted, 3 (d) must stay. Amend to “All classes of deer must be provided with means to minimise the effects of heat stress. Delete (b)(v) in GI Include in new GI statement “In excessively hot weather conditions, all classes of deer will require more water as deer drink water to mitigate heat stress.” |
| 3.2 Water GI P24 | 1 | (b) insert new words for clarity “...behaviour in the first two weeks of life.” | Not included in public draft |
| 3.2 Water GI P24* | 1 | c) remove as per reasons under MS No.2. | Disagree, leave as is because clarifies the MS |
| 3.2 Water GI P24* | 1 | Remove (v) with introduction of MS as per above. | Agree, amend |
| 3.2 Water GI P24 | 1 | (d) insert new words for clarity End of last sentence to read: “..livestock weight and size.” | Agree, amend |
| 3.2 Water T3 P25 | 1 | Sixth paragraph “the lower” renamed as nil (maintenance) | Noted, Delete after g/day. |
| 3.2 Water T3 | 1 | Seventh paragraph | Agree, amend (note two changes). |

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| P25 | | Requirement = intake | Note para 8 changes too. |
| 3.2 Water T3 P25 | 1 | Ninth paragraph Requirement = intake | Agree, amend |
| 4.1 P26 | 1 | Fifth paragraph insert new words for clarity “.. growth or maintenance if poorly fed..” | Agree, amend to “...divert energy from growth and maintenance into heat production.” |
| 4.1 P26 | 1 | Fifth paragraph insert new word for clarity “.. in cold weather.” | Agree, amend Change ‘poor’ to ‘cold’ Note 2nd sentence deleted |
| 4.1 P26 | 1 | Sixth paragraph insert new words for clarity “Some sites and deer farms may....due to exposure to rainfall...” | Agree amend to: “Some sites...” ‘and deer farms’ not included. |
| 4.1 P26 | 4 | 4 th para Deer Branch disputes that wet deer are poorly insulated. In the next sentence ‘post-rut’ should be inserted before ‘males’ (stags??) | Noted, amend to: “Rainy weather further compounds the influence of wind and cold as deer, when wet, may have reduced insulation.” Agree, amend to: “Males after the rut, and young stock, have very little fat cover and are more vulnerable to the effects of cold weather.” |
| MS No. 3 P26 | 4 | (a) Deer Branch contends that clinical hypothermia is usually only seen in deer that are otherwise unhealthy. Suggest replace with ‘wind chill’ | Disagree but all MS have been changed |
| MS No. 3 P26 | 7 | Minimum standards are vague and could be impractical. What is suitable shelter? Farmers comments: What is excessively hot? Couldn’t comply immediately Many farms have shelter but not every in paddock. Deer don’t always use shelter even when provided. Do all paddocks require shade? Do shelter belts count as shade? | Noted, all MS have been changed |

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| | | <p>Sets a bad precedent for other livestock codes. If shelter is provided but fawns dies from hypothermia, is this an offence? FF recommends greater clarity, to ensure that provision of shade and shelter is not impractical.</p> | |
| MS No. 3 P26 | 8 | <p>Supportive of the 3 minimum standards as ideals however may be unworkable. Will similar requirements be set for other pastoral species? 3(c) most modern dairy farms can't comply with this, as would many sheep farms. Deer will often not seek shade even in temps of 25-32°C. No documented cases of negative consequences from heat exhaustion or over exposure to sun. 3(a) – support with noted reservations 3(b) - Support 3 3(c) – don't support and should be changed to a recommended best practice.</p> | <p>Noted, all MS have been changed Shade and shelter critical for all pastoral species. 3(c) stays but Agree, amend</p> |
| MS No. 3 P26 | 9 | <p>Support the concept but how can you apply the minimum standard to all farms. Deer are very adaptable. (a) & (b) – 'allow for some difference in interpretation between farms' Problem with (c) as: -not all paddocks will have shelter – may not be practical in some cases e.g. airstrip paddock - deer don't always seek shade in hot weather - what is excessively hot - sets a bad precedent for future codes</p> | <p>Noted, all MS have been changed</p> |
| MS No. 3 P26 | 12 | <p>Need to define excessively hot.</p> | <p>Noted, all MS have been changed</p> |

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| | | Diurnal variation is difficult for animals to adapt to. Deer are forest animals therefore need to access appropriate shade and shelter. | |
| P27 (a) | 2 | Badly written | Agree, amend to: “Farmers should provide shelter and shade through tree plantings, artificial shade, access to mature tree blocks, or paddocks with contours that provide protection from adverse weather conditions.” |
| P27 RBP (a) & (b) | 3 | Clumsy text, needs to be edited | Agree, amend to: “Farmers should provide shelter and shade through tree plantings, artificial shade, access to mature tree blocks, or paddocks with contours that provide protection from adverse weather conditions.” |
| P27 RBP (d) | 12 | Should be a minimum standard as all farmers must be prepared for emergencies and ideally these should be in writing as part of the farm mgmt plan. | Disagree, leave as is |
| 4.2 RB P27 | 1 | (c) insert new words for clarity “..blocks or suitable topography to provide..” | Agree, amend to: “Farmers should provide shelter and shade through tree plantings, artificial shade, access to mature tree blocks, or paddocks with contours that provide protection from adverse weather conditions.” |
| 4.2 GI P27 | 1 | (c) insert new word for clarity “.. soon as is safely possible.” | Agree, amend to: “Farmers should provide shelter and shade through tree plantings, artificial shade, access to mature tree blocks, or paddocks with contours that provide |

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| | | | protection from adverse weather conditions.” |
| 4.2 GI P27 | 1 | (f) re-word Remove the word “highly” | Agree, amend Change highly to very |
| P27 GI(f) | 2 | Last 2 words should be ‘cut branches’ not ‘tree branches’ | Agree, amend |
| MS No. 4 P29 | 1 | (f) insert new word for clarity “... to any natural...” | Disagree, leave as is |
| MS No. 4 P29 | 9 | (f) too definitive and this level of light not required for the normal safe handling of animals | Disagree, leave as is Subcommittee believes that 50 lux is minimum necessary for deer to exhibit normal behaviour. Most facilities NAWAC subcommittee saw provided at least 50 lux. |
| MS No. 4 P29 | 1 | (i) A ny | Agree, amend |
| MS No. 4 P29 | 1 | (j) de er | Agree, amend |
| MS No. 4 P29 | 5 | (j) Allowance must be given to trophy animals, transportation, and inspections etc. Nonsense. | Agree, amend now MS 5(j) “To minimise aggression and injuries, additional care must be taken when male deer with hard antlers are held in holding facilities.” |
| MS No. 4 P29 | 8 | (j) Too restrictive and suggest removed to Recommended best practice. Yarding and confinement sometimes required during times of antler growth – e.g. sales, prior to transport, antler measurement. Can be achieved with facility modification for animal and human safety. Accepted that handing stags late in the season is dangerous and therefore handlers need to be experienced. Some farmers do routinely handle and hold young males in hard antler – good for developing experience of young | Agree, amend now MS 5(j) “To minimise aggression and injuries, additional care must be taken when male deer with hard antlers are held in holding facilities.” |

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| | | males. | |
| MS No. 4 P29 | 1 | (j) Need a definition for confinement as situations may include for sales, measurement practices etc and <i>suggest moved to RBP</i> Suggested: male deer with hard antler should not be confined for long periods of time in indoor facilities | Agree, amend now MS 5(j) "To minimise aggression and injuries, additional care must be taken when male deer with hard antlers are held in holding facilities." |
| MS No. 4 P29 | 10 | (j) Deer with hard antler sometimes need to be confined e.g. transport, removal or antler or general safety | Agree, amend now MS 5(j) "To minimise aggression and injuries, additional care must be taken when male deer with hard antlers are held in holding facilities." |
| MS No. 4 P29 | 1 | (l) space | Agree, amend |
| MS No. 4 P29 | 12 | Keeping of deer in holding facilities is detrimental to welfare. Minimum standard needs to be more robust to ensure that deer not held for long periods. Forest animals which have not been domesticated for very long. Holding of animals where they are unable to display normal behaviours is contrary to the Act. Confinement accepted for convalescence and newborn fawns in very cold weather. Confinement periods should not exceed 3 days and any longer is contrary to Act. Exception for holding during very severe weather should be written into minimum standard.. | Disagree, leave as is Acknowledge that some behaviours will be curtailed but there are welfare benefits (e.g. shelter in winter weather, reduced mortalities). |
| MS No. 4 P29 | 12 | (e) 25ppm too high and must be reduced to 15ppm 20ppm is enough to cause nasal irritation in humans, and deer have larger and more sensitive nasal tissue. | Disagree, leave as is Consistent with pig and broiler codes |
| MS No. 4 P29 | 12 | (l) minimum space requirements acceptable provided that animals are only held in situations as noted or for | Disagree, leave as is Space allowances are routinely |

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| | | <p>periods not more than 3 days. If deer are confined for more than 3 days, then more space is required. SPCA is strongly opposed to the intensive farming or rearing of deer in indoor facilities as deer not suitable to long term confinement. If practiced should be access to outdoor areas. If practiced SPCA would accept purpose facilities with outdoor access.</p> | <p>practised by industry. Facilities viewed by NAWAC showed these minimum space requirements were adequate.</p> <p>New recommended best practice added: "Outdoor runs should be provided."</p> |
| MS No. 4 P29 | 10 | Farmers do not have equipment to measure lux or ammonia levels. | Noted, but general guides (without the need for equipment) are given in General information. |
| 4.3 RBP p30 | 12 | <p>Need to have strong encouragement to farmers to find alternative types of shelter e.g. open-ended shelters, so as to avoid need to contain deer in fully covered housing. Provision of such shelter would mean less pugging and allow access to deer as required.</p> | Disagree, leave as is |
| 4.3 RBP p30 | 5 | <p>(a) Far too bright. Not impractical especially in 1 man operations. (d) Impractical</p> | <p>(a) Noted, now MS "...20 lux..." (d) Disagree, leave as is</p> |
| 4.3 RBP P31 | 10 | Radio in deer sheds tends to stress deer therefore suggest delete. | Disagree, leave as is |
| 4.3 RBP P31 | 12 | <p>(q) Should be a minimum standard Recommended best practice should include that newly treated timber should be weathered for at least 6 mnths prior to use. Alternatively treated surfaces should be painted with a non-toxic paint.</p> | Disagree, leave as is |
| 4.3 P31 GI | 2 | (c) add bare skin patches | Agree, amend |
| 4.3 GI P31 | 1 | (f) Anim als | Agree, amend |

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| MS No. 5 P32 | 5 | (e) Unworkable. Too bright. Deer settle better in less light. | Agree, amend to 20 lux |
| MS No. 5 P32 | 9 | (e) too definitive and this level of light not required for the normal safe handling of animals | Agree, amend to 20 lux |
| 4.4 RBP P33 | 1 | (f) p aint | Agree, amend |
| 4.5 RBP P34 | 2 | (c) may cause rather than predispose | Agree, amend |
| 4.5 RBP P34 | 1 | (f) replace word for clarity Replace “when” with the word If | Agree, amend |
| 4.5 RBP P34 | 12 | (e) should be a minimum standard as deer are flighty do not respond well to confinement. | Disagree, leave as is In general farmers will not hold animals for longer than necessary. Change “long” to “...prolonged...” |
| 4.5 GI P34 | 1 | (a) insert new word for clarity “.. in the safe movement...” | Agree, amend |
| 4.6 RBP P35 | 5 | (a) Impossible to administer pain relief drugs and remove antler on adult stags or calve hinds in that time | Agree, amend to MS “(e) Deer must not be held in a restraint for more than the time required to carry out the procedures for which they are being restrained.” |
| 5.1 I P36 | 2 | Para 5 Lack of disrupted routine, instead of lack of routine | Agree, amend to: “Lack of, or disrupted, routine may aggravate bullying and...” |
| 5.2 I P37 | 1 | Combine bullet points Combine as embryo recovery and transfer | No longer in code |
| MS No.8 P37 | 1 | (a) make plural “.. in these processes.” | No longer in code |
| 5.2 GI P38 | 1 | (c) clarify “..of 3.0 – 3.5.” | No longer in code |
| 5.2 GI P38 | 1 | (f) att ention | No longer in code |
| 5.3. P 38 | 2 | Missing a title | Agree, amend to “Mixing of deer” |
| 5.3 P38 | 1 | Re-wording Introduction = Mixing of Deer, and create paragraph | Agree, amend |

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| | | heading Introduction | |
| 5.3 MS 9 | 7 | Daily observations may be impractical in some circumstances, due to extenuating circumstances or difficulties due to NZ's natural systems. Suggest 'on a regular basis' | Disagree, leave as is Seems reasonable to prevent injuries and bullying. The qualifier is that daily observations until animals are settled. Delete 'stress' and add "...continued aggression likely to lead to injury..." |
| 5.3 RBP P38 | 2 | (a) Add '... then monitored closely for signs of bullying. Why it should be smaller group is a mystery. | Agree, amend to "...and injury and monitored closely to ensure that confrontation is minimised. When predisposing factors have been identified they should be dealt with immediately." |
| 5.3 GI P39 | 4 | (b) 2 nd sentence 'Introducing a stag to a new group...'. Of what – stags? | Noted, add "...of other male deer..." |
| 5.4 RBP p 40 | 2 | (b) Add '... and monitored to ensure confrontation is minimised | Agree, amend to: "...they should be monitored and adequate space be provided..." |
| 5.4, 5.5 P40 etc | 1 | Replace the word stag with male in all cases Stag = male | Agree, amend for this section only |
| 5.5.1 RBP P41 | 5 | (e) Not practical | Agree, amend Delete (e), add GI "Some farmers believe that males should experience at least 1 year as a juvenile (yearling or 2-year-old) in which hard antler has been carried through to casting of that antler prior to the growth of the next season's new velvet, in order to allow for neck muscle development to support the carriage of hard antler in subsequent |

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| | | | seasons.” |
| 5.5.1 RBP P41 | 1 | d) spelling matagouri = matagourie | Disagree, leave as is Oxford Dictionary spelling |
| 5.5.1 RBP P41 | 2 | (e) What is the point of this? Needs a reason added. | Agree, amend Delete (e), add GI “Some farmers believe that males should experience at least 1 year as a juvenile (yearling or 2-year-old) in which hard antler has been carried through to casting of that antler prior to the growth of the next season’s new velvet, in order to allow for neck muscle development to support the carriage of hard antler in subsequent seasons.” |
| 5.5.2 P41 | 1 | (c) re- word for clarity “.. veterinarian needs to be...” | Agree, amend ‘must’ to “...should...” |
| 5.6 RBP P42 | 5 | (e) Stocking rates may vary all over NZ. Nonsense. | Agree, amend |
| 5.6 RBP P42 | 2 | (f) at least 7-10 days | Agree, amend |
| 5.6 RBP P42 | 1 | (f) Female s | Agree, amend |
| 5.6 RBP P42 | 4 | (a) repeats information given under Nutrition | Disagree, leave as is but delete reference to Table. |
| 5.6 RBP P42 | 4 | (b) Deer Branch is unaware of any research that confirms the statement on the first sentence. | Disagree, leave as is but change loses to losses This is supported by published research. |
| 5.6 RBP P42 | 4 | (e) Inconsistent to include a stocking rate for one type of deer only | Agree, amend |
| 5.6 GI P42 | 1 | (a) re-word Remove last sentence as birthing is occurring earlier | Agree, amend Join last two sentences with a ‘thus’ |
| 5.6 5.7 P42 etc | 1 | Change hind to read female to maintain convention Hind = female | Agree, amend for this section only |

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| 5.7.1 GI P43 | 1 | (b) insert new words for clarity “.. failure to develop a fawn-dam bond.” | Agree, amend |
| 5.7.1 GI P43 | 3 | Hinds susceptible to stress prior to fawning can lead to neonatal disease. Suggested that hinds need to have plenty of space to reduce the risk of stress induced pathogens. Add new (d) (d) Close to the time of giving birth, hinds instinctively seek to distance themselves from the rest of the herd. In unsuitable paddocks or when the stocking rate is too high they may pace the fence-line, even galloping up and down in an attempt to get away from the herd. It is important to provide sufficient space and shelter in fawning paddocks so that each hind can find a suitable isolated birth site. | Agree, amend |
| 5.7.1 RBP P43 | 3 | See previous comments Add new (d) Sufficient space must be provided for groups of fawning hinds so that each hind can find a suitable quiet and safe place to give birth. | Agree, amend as above |
| MS No. 11 P44 | 1 | (a) change word for better meaning Appropriate = equivalent | Agree, amend |
| M.S 11(a) P44 | 4 | The Deer Branch is unaware of any research into colostrum absorption times in deer. The minimum standard for calves has been set at 6 hours and that would seem more appropriate in the absence of any evidence to the contrary. It would also be appropriate to have an RBP which states that such fawns should receive colostrum within a couple of hours of birth. | Noted, reference to a specific time period deleted |
| M.S 11(a) P44 | 7 | More practical to amend to ‘Farmers must take all reasonable steps’ to provide colostrum, as may be | Noted, reference to a specific time period deleted |

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| | | difficult to obtain within that timeframe. | |
| 5.7.2 RBP P44 | 1 | (b) no time given for how long to inspect for “... coughing for the period of rearing.” | Agree, amend |
| 5.7.2 GI | 1 | (a) end of line needs a fullstop | Agree, amend |
| 5.7.2 GI (e) | 4 | ‘practical’ should be replaced with ‘practicable’ | Agree, amend |
| 5.8 P45 | 1 | Change word Hind = mother = dam | Agree, amend |
| 5.8 P45 I | 2 | Para 1 Change ‘suckling continues’ to ‘suckling often continues’ | Agree, amend |
| 5.8 RBP P45 | 1 | (a) re-word to clarify Remove “or less than 28kg” as refers to red deer only and remove last sentence | Agree, amend |
| 5.8 RBP P45 | 2 | (c) ‘As far as practicable’ | Agree, amend |
| 5.8 RBP P46 | 1 | (f) Operations | Agree, amend |
| 5.8 RBP P46 | 2 | (f) preweaning or post -weaning | Disagree, leave as is as would be traumatic to handle again post weaning |
| 5.9 RBP P46 | 12 | (e) Ear marking is now uncommon and that tagging is common and less stressful. Ear marking should be banned and be included as a minimum standard. | Disagree, leave as is Consistent with other codes. We have a strong recommendation against it. |
| 5.9 RBP P47 | 1 | (f) W hen | Agree, amend |
| 6.1 Note P48 | 1 | Incorrect reference “... section 2.1 Legal... 16.” | Agree, amend Delete ‘Note’ |
| 6.1 RBP P48 | 1 | (b) re-word for clarity “.. isolated and kept alone unless...” | Agree, amend to “...not be kept alone...” |
| 6.1 RBP P49 | 1 | (f) re-word: implies can do PM more than once “... out on any fatalities” | Agree, amend to “As often as practicable, post-mortems...” |
| 6.1 RBP P49 | 1 | (h) implies vets get scouring “.. for deer scouring.” | Agree, amend to “When scouring occurs, a veterinarian should be consulted to determine the appropriate treatment for the |

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| | | | problem.” |
| 6.1 GI P49 | 1 | (a),shivering space needed after comma “.., shivering..” | Agree, amend |
| 6.1 GI P49 | 4 | (e) should include protozoan | Disagree, leave as is |
| MS 14(a) & (b) P50 | 4 | 1. – there is a question over the effectiveness of setting a standard that includes a requirement for inspection at “regular” intervals – once a year is regular. There should be an interval specified here and another shorter one in an RBP. | Agree, amend (a) to “...must inspect deer at such frequency as is appropriate...” Delete (b) |
| MS 14(a) & (b) P50 | 12 | Insufficient to have ‘regular’ as is unclear. Suggest in extensive situations inspections should be no less than once/7 days. Suggest when deer in yards, holding paddocks, on-farm holding facilities then must be daily. | Agree, amend (a) to “...must inspect deer at such frequency as is appropriate...” Delete (b) |
| 6.2 RBP P50 | 12 | Suggest new rbp Inspections should take place twice daily where deer held in smaller holding paddocks, yards or on-farm holding facilities and every 3 days in extensive situations. | Agree, amend to MS (b) Deer held in winter holding facilities must be inspected at least daily. |
| MS No.15 P51 | 4 | (c) Are not unweaned hinds necessarily hinds with fawns at foot? | Agree, amend to “Unweaned deer (dams with fawns at foot)..” |
| RBP P51 | 5 | (c)?Truck pick up at 6.00am deer in shed by 2.00am. Nonsense. | Disagree, leave as is Is a minimum of 4 not a maximum |
| MS No.15 P51 | 1 | (e) clarification Is already in AWAC Transport in NZ No.15 and shouldn’t be repeated | Disagree, leave as is This section is pre transport selection |
| MS No.15 P51 | 7 | (b) No such requirement in current transport code. The code recommends that early veterinary advice is sought. No justification for this standard, need scientific evidence for this standard. | Disagree, leave as is Accepted industry practice is to not transport deer in last 3 weeks prior to fawning. |

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| 7 RBP P51 | 1 | (c) should include water here “..hours. Water should be available during this time.” | Agree, amend as below |
| 7 RBP P51 | 2 | (c) Clean water should be available from a familiar source during this time. | Agree, amend |
| 8.1 RBP P53 | 1 | Remove/insert new words for clarity “.. New Zealand’s QA programmes, or specific processor...” | Agree, amend |
| 8.1GI P53 | 4 | (b) & (c) Would these not fit better after Ms 16? | Agree, amend to GI under Stockmanship |
| Appendix IV P61 | 2 | Add pasture and brassicas to the table (make it show all feeds not just supplements) | Disagree, leave as is but change title to “...Different Supplements” Brassicas would be fed with hay, silage or pasture |
| Appendix VI P63 | 1 | Common Farmed species red deer also have sub species | Disagree, leave as is |