

Summary of Submissions – Animal Welfare (Dogs) Code of Welfare

Section 1. Introduction, Purpose and Interpretation of the Code

Pt	Pp	Submitter	Submission	NAWAC Response
1.2	5	48,150,165,	Scope: Ensure that sled dogs and weight pulling dogs have been included in the category of 'sporting dogs'.	Sled pulling dogs have been referred to here
1.2	5	231	Scope: The insertion of both the 'removal of dew claws' and the 'tail docking' as restricted surgical procedures is an abuse of the protocols set down for the formation of the Code.	Disagree
1.2	5	226	<p>Scope: The SPCA is pleased to see that the scope of the code covers dogs in all situations, including those used as working animals and those used for sport.</p> <p>The SPCA notes two apparent anomalies in the scope as currently written:</p> <ol style="list-style-type: none"> 1. In the paragraph referring to other codes that may be relevant, the circus code is listed as a code in production. This code was gazetted in 2005. 2. The final paragraph concerning consumer rights refers to puppies requiring to be "fit for purpose" and "free of defects". The same is true of any dog sold within the meaning of the Act. 	<p>1. This paragraph has been rewritten and reference to the circus code removed.</p> <p>2. This sentence has been changed to reflect that puppies and dogs must be fit for purpose.</p>
1.2	6	222	Dog Control Requirements: The reference to the date '1 st July 2003 should read 1st Dec 2003'. Dogs registered on or after 1 July 2006 are required to be implanted with a functioning microchip after 2 months of the date of registration. Dogs that are classed as dangerous or menacing after 1 st Dec are required to be microchipped	The date has been changed and information has been added to reflect the requirements for dogs to be fitted with a microchip when registering after 1 July 06 or are dangerous/menacing.

within 2 months after the date on which the dog is classified (or by Sept 1 2006, if it is classified before 1 July 06). The text needs to be updated to reflect this. From 1 July 06 unregistered dogs that are impounded and registered dogs that are impounded more than once are also required to be microchipped. To be consistent with the wording in the DCA we suggest that you omit the 'live' from 'livestock'.

The last 2 sentences of the second paragraph where there is reference to 'dangerous dogs'. 'Menacing dogs' also exist under the DCA and should also be added here. The last sentence under this heading should state 'territorial authorities (city and district councils) are required to adopt policies for dog control and may also maintain bylaws to manage dogs in your area'.

The term 'livestock' is used in the code to conform with the term used throughout this CoW and other CoW's.

'Menacing dogs' have been added here.

Text amended to be less specific but reference to local authorities remains.

1.2 6 91

Disease Control Requirements: Offal should not be fed to dogs at all. Incorrect preparation can cause problems. How do we monitor the cooking of food to prevent sheep measles? States that this fact is not common knowledge.

The need to ensure that offal is prepared carefully, to avoid health risks, has been emphasized.

1.2 6 73

Consumer Rights: Change wording 'free from defects'. No animal is born free of 'defects' – change this.

This is standard wording under the 'consumer guarantees act'

1.2 6 91

Consumer Rights: No-one can guarantee that a dog will be a dog free of defects - the defect may only present itself 6 months or a year down the track. In addition, any problems may be either inheritable or due to environmental influences.

This is standard wording under the 'consumer guarantees act'

1.2 6 48

Consumer Rights: How does a designer dog breeder (cross breed) guarantee that a dog is fit for purpose and free from defects with little knowledge or consideration of background breeding.

This is standard wording under the 'consumer guarantees act'

1.2 6 178

Disease Control Requirements: Word 'raw' should be inserted before 'offal'.

NAWAC agrees – this has been inserted

1.2	6	178	Disease Control Requirements: Slaughtering of ruminants and pigs in home killing facilities is not always possible to perform within a dog proof enclosure if stock is already 'down' in the paddock	This is a requirement under the Biosecurity Act.
1.3	6	73	Legal Status of COW: As only the MS have legal effect, this means that the rest of the code is basically the same as a book from a bookstore. The public are unlikely to read the COW in place of a book and so believes that most of the information in here (everything except the MS) is unnecessary.	The MS's are accentuated within the text and note is given to the fact that only these are enforceable. The general information ensures that the reader is aware of why each MS is being included and gives information on meeting the requirements of each MS. Information within RBP is important to include as an 'over and above MS' level of welfare.
1.4	7	73	Process for Code Development: The draft of the Code was not sent to the 'Versatile Hunting Dog Test Assn (NZ)', 'NZ Gundog Trails Assn' or 'Fish & Game' for review.	Draft code was publicly notified and sent to F&G, NZHDTA and other representative organisations (eg Game & Forest Foundation) as per publicly available contact details. Submissions received from VHDTA
1.5	8	42	Contents of this Code: Disagrees with the use of the phrase 'opportunity to display normal patterns of behaviour' on the basis that the dog is a pack predator – so this may imply that the code is allowing dogs to hunt and kill.	Disagrees with this comment. This is one of the internationally accepted five freedoms of animal welfare. This freedom covers a number of behaviours - it does not refer specifically to 'hunting and killing'
1.5	8	169	Contents of this Code: Strongly disagrees with section 73 (3) and 73 (4) of the act. There should be no exceptions to the MS's for practical, religious or cultural reasons.	Noted. This does not relate to code.
1.5	8	169	Contents of this Code: Insert text (last line on pp8) that 'physical handling in a manner which PREVENTS the likelihood of unreasonable or unnecessary pain or distress'.	This comment (and others contained in this submission) are emphasizing the requirement to minimize pain and distress. The current emphasis in the Code is considered appropriate.
1.7.2	10	169	Definitions, Animal (b): Submit that wording is changed to read 'Includes any mammalian foetus, or any avian or reptilian pre-hatched young or any animals in the pre-natal, pre-hatched, larval, or other such developmental stage'.	The word 'animal' is defined in the Animal Welfare Act

1.8	11	154,183,	Glossary, Animal Behaviourist: this definition is not clear. This needs to be clarified or removed.	The definition has been refined.
1.8	11	156	Glossary, Sporting Dog: Seeking the addition of an additional category as 'racing dog'. Racing dogs differ from 'sporting dogs' in many ways.	Category 'racing dog' has been added
1.8	11	178	Glossary, Tethering: Change the word 'rope' to 'restraint' as chains, boot laces etc could be used and escape the intent of this definition.	Word 'rope' has been changed to 'secure restraint'
1.8	11	206	Glossary, Whelping: Definition could be changed to 'Parturition. A bitch in the act of giving birth'.	This has been changed
1.8	11	178	Glossary, Working Dog: after 'and security /guard dogs' needs to also repeat reference to 'as defined in the Dog Control Act 1996' to ensure compliance consistency.	It is currently clear that this is referring to the definition in the Dog Control Act.
1.8	11	195	Glossary: Add and define the word 'distress' as used in this code.	Dictionary definition.
1.8	11	180	Glossary: Add and define the definition of a 'breeder'.	Dictionary definition.
1.8	11	222	Glossary: Add definition for 'menacing dogs'.	Definition added
1.8	11	222	Glossary: Note that the definitions included in the COW should also tally with those in the DCA. More information is provided in the submission.	Noted and amended where necessary.

Section 2. Legal Obligations of Owners and Persons in Charge of Animals

Pt	Pp	Submission	Submitter	NAWAC Response
2	13	169	Legal Obligations of Owners and...: (b) Delete the words ' <i>without reasonable excuse</i> '.	Standard wording
2	13	89,92,102,106,107,108,113,121,127,131,155,169,171,175,176,184,217,	Legal Obligations...b (ii): Selling a dog 'for the purpose of being killed' – wording is unnecessary and repugnant.	Standard wording
2	13	110	Legal Obligations...: b (ii): Oppose the word 'kill' recommend the word 'euthanise'.	Standard wording
2	13	206	Legal Obligations of Owners and (ciii) Under what authority is a veterinarian empowered to approve a person?	Standard wording
2	13	169	Legal Obligations of Owners and...: (ciii) The following words should be deleted from the draft ' <i>or in the case of a controlled surgical procedure , a person approved by a veterinarian</i> '.	Standard wording
2	13	169	Legal Obligations of Owners and...(c) (iv) The following words should be deleted from the draft 'perform on a dog a procedure that is not a significant surgical procedure IN SUCH A MANNER THAT THE DOG SUFFERS UNREASONABLE OR UNNECESSARY PAIN OR DISTRESS' and the following text added 'UNLESS THAT PERSON IS A VETERINARIAN, OR A VETERINARY STUDENT UNDER THE DIRECT SUPERVISION OF A VETERINARIAN'.	Standard wording

Section 3. Dog Ownership

Pt	Pp	Submission	Submitter	NAWAC Response
3.1	14	226	Purchasing or Adopting a Dog: While the code refers readers to section 1.2 for further information on other national and local legislation pertaining to dog ownership, the SPCA believes specific reference should be made in this section to the requirement for all dogs to be registered, and for dogs (other than those kept solely or principally for the purposes of herding or driving livestock) to be microchipped. This is a basic requirement of ownership and should be clearly stated in the code with reference to the Dog Control Act. Many welfare problems concerning dogs would be quickly resolved if the animal was clearly identified with its owner.	This information has been added to this section
3.1	14	73	Purchasing or Adopting a Dog: The term 'adopting' should be changed to 'obtaining' on the basis that the term 'adopting' is anthropomorphic.	Disagree. Adopting is a standard term for obtaining a dog from an animal welfare shelter.
3.1	14	67	Purchasing or Adopting a Dog RBP a): In relation to the statement '...intending dog owners should seek independent advice from experts (such as breeders)'. Submission suggests that this should be scrutinized as breeders cannot always be relied on to give impartial or independent advice as they have a financial interest. Some are more reputable than others.	Text changed to 'reputable breeders'

3.1	14	116	Purchasing or Adopting a Dog RBP a): Maybe add some wording which stressors the purchaser's obligation to be completely open with the seller about what sort of home they can offer and the qualities they are seeking in a dog.	Text has been added to emphasize this.
3.1	14	161	Purchasing or Adopting a Dog RBP a): Breeders should not be regarded as experts as long as the kennel club and breed clubs persist with 'breed standards' as these are subject to changing design and unnatural imposition of 'fashion' on dogs. It makes little sense for a dog to be 'fashioned' for hunting for example, when it is principally retained for the show ring and breeding. Adherence to these standards is more likely to limit the gene pool.	Text changed to 'reputable breeders'
3.1	14	161	Purchasing or Adopting a Dog RBP a): Suggests that all local government offices, as licensing authorities, be required to provide a written summary of these guidelines (COW) to all owners when registering their dogs.	Noted. Suggestion will be followed up when support material is produced to accompany code.
3.1	14	108	Purchasing or Adopting a Dog RBP b): Pet retailers are motivated my profit and encourage impulse buying. The words 'or pet retailer' should be removed.	At the present time pets are still bought from pet retailers and therefore details of the current feeding regime and other information should be obtained when purchasing a dog from this source to ensure that the welfare is as high as possible.
3.1	14	6	Purchasing or Adopting a Dog RBP c): After the words 'one or two days supply of this diet... add the words 'where practical'.	Words 'where possible' have been added here.
3.1	14	209	Purchasing or Adopting a Dog RBP c): It should be noted, in relation to <i>recommended best practice 3.1(c)</i> , that dogs adopted from the Council animal shelter have been fed a "transitory" diet for the last 7 days minimum. Dogs held at the shelter are most likely unregistered, meaning the previous feeding regime is unknown.	Information relating to this has been added to the text.

3.1	14	65	Purchasing or Adopting a Dog RPB c): Remove 'animal welfare shelter' from the list of people who could provide an example of the dog's diet upon purchase. These diets are likely to be balanced to cater for the 'average' dog but are not likely to be optimal for the individual dog. It is better that new owners are provided with dietary advice as part of (b).	It has been emphasized that a new owner may wish to change their dog's diet to that which is more likely to be optimal for the specific breed.
3.1	14	48	Purchasing or Adopting a Dog GI: Add information that care should be taken when choosing a dog of mixed parentage, in particular consider the appropriate adult size, temperament, coat and any tendencies towards health problems	Text added to reflect this.
3.1	14	161	Purchasing or Adopting a Dog: Microchip transponders – Noting the continual and rapid advances in genetic and forensic science other methods of identifying dogs should be investigated that would be preferable to the invasive surgery of inserting microchips. Also sterilization should be compulsory for aggressive/menacing dogs and be carried out at the same time.	Noted. Outside the remit of code of welfare discussion.

Section 4. Food and Water

Pt	Pp	Submitter	Submission	NAWAC Response
4.1	15	195	Food and Feeding: Feeding regime can be obtained from an appropriate knowledgeable source – not only veterinarians who are knowledgeable.	Text changed to read 'advice should be sought from an appropriate source'
4.1	15	206	Food and Feeding Intro: The first sentence could be amended to read 'Dogs should receive a suitable daily diet in adequate quantities to meet their requirements appropriate to their health and welfare and to maintain their ideal bodyweight. A second sentence could then be inserted at the end of the current paragraph 'The increased availability of specialized diets mean that 'normal' diets may not be appropriate for the good health and welfare of individual animals with specific health problems.'	Text of the first sentence has been changed slightly. A sentence has been added to the first paragraph to emphasize the use of specialized diets for dogs with specific health problems.
4.1	15	6,85,89,92,111,115,121,131,165,175,217,	Food and Feeding Intro: The word 'can' or 'usually' or 'are intended to' should be added after the words 'commercial dog food' (last para on pp 15).	Word 'usually' has been added.
4.1	15	85,116,180,209,	Food and Feeding Intro: Pet rolls and pottled dog foods are often used by many breeders in conjunction with other forms of food and I see no reason why these are not included. (Submission 209 states that they could be fed as long as something that cleans the tartar from the teeth is also fed at the same time)	NAWAC disagrees that these should be used as sole diet but has added information outlining that they can be used in conjunction with other foodstuff as part of an overall balanced diet.

4.1	15	89,92,106,107,113,121,131,	Food and Feeding Intro: Pet rolls and pottled dog foods are 'generally <i>unsuitable</i> ' as a sole maintenance diet	Word 'unsuitable' has been used here.
4.1	15	140	Food and Feeding Intro: It could be useful to add information about what needs to be added to pet rolls to make a complete diet and if the appropriate ingredients/proportions for home made foods were listed.	NAWAC disagrees. There is much information that could be added to this section and it would be outside the objectives of a CoW to list all foodstuffs.
4.1	15	87,101,116,123,138,140,147,151,158,159,162,163,170,171,181,200,	Food and Feeding Intro: Disagrees with the statement that dogs require commercial dog food, as it is cooked during processing, has lost many of the essential nutrients and is full of chemicals/preservatives and contains the entrails and waste at the end of the human food chain. Suggests that dogs should be fed on the BARF diet which consists of bones and raw food. The diet should be 60% raw meaty bones and the rest should consist of human food scraps. The diet does not have to include a balanced meal each day, but should provide an overall balanced diet over a number of days of feeding. This option and other options for feeding should be addressed in the code.	Most vets disagree with the use of this diet as problems associated with feeding a dog large amounts of bones have been noted.
4.1	15	200	Food and Feeding Intro: The promotion of commercially based food does not enable owners to treat their animal herbally or neuropathically.	The information in this CoW relating to commercial foodstuffs is general information and is not enforced by use of an MS. As long as an owner is within the legislation of the Animal Welfare Act and the MS's in this CoW, they are able to provide their dogs with herbal treatment.
4.1	15	6,101,102,108,140,158,181,203,205,	Food and Feeding Intro: States that commercial dog food is not necessarily the ideal feed for all dogs. Some dogs can be over or under weight, bloated or neurotic on these	The word 'usually' has been used in relation to the provision of nutrients in commercial dog foods. Additional information has been given in relation to specialized diets for dogs with specific health problems.

feeds. Also issues with worldwide recalls of some brands last year.

4.1	16	211	Food and Feeding RBP a) Don't agree with the text re pups 'weaning up to 6 months'. Suggest this might be best changed to '4 months' as ad lib of pups can result in them becoming overweight quickly. Most pups are on feeds twice daily by this stage and don't require feeding 'throughout the day'.	The text has been changed to reflect this.
4.1	16	217	Food and Feeding RBP b) and c): Delete b) and c) as feeding requirements vary between breeds. Giant breeds grow rapidly and need frequent feeds during development but toy breeds, which mature much earlier, can dispense with extra feeds at a much earlier age.	Text has been added to provide information to state that breeds grow at different rates and need feeding according to their rate of development.
4.1	16	179	Food and Feeding RBP c): The cut off point for feeding dogs once a day is generally 18 months. This RBP does not take into account different breeds, jobs or circumstances, and some situations require a flexible approach in terms of feeding dogs. His working farm dogs are fed daily when working, but only 3 times per week in the off season. They are also body condition scored regularly.	Text has been added to provide information to state that dogs working in different situations may use more energy. It is recommended that dogs are fed according to their own specific requirements.
4.1	16	212	Food and Feeding RBP c): Dogs should be fed twice a day 'where practical' (not always possible for working dogs).	This RPB says that it is generally best to divide the feed into two. It is recognized that this will not always be practical in the case of working dogs.
4.1	16	29	Food and Feeding RBP d): Instructions on diets for certain medical conditions should not just be restricted to vets as knowledgeable members of the public and/or breeders should also be able to give advice if they so wish	The advice of a veterinarian should be sought to ensure that the diagnosis of a suspected condition is correct. At this time, a veterinarian can also advise on the optimum diet to feed a dog with a suspected condition.

4.1	16	91	Food and Feeding RBP: Suggests alternative wording: a) puppies up to 3 months of age should be fed 3 times per day and up to 6 months of age, twice per day, b) over 6 months once or twice per day, f) advice should be sought from a vet or pet store or breeder	Text reflects current recommended best practice.
4.1.1	17	91	Dogs with Special Nutritional Requirements: Pregnant and lactating bitches should be fed puppy food. Feeding advice for growing dogs should be sought from a veterinary surgeon, a <i>pet store</i> or a breeder.	Information about feeding puppy food has been added to the text. It is recommended that expert advice is obtained in regard to feeding growing dogs.
4.1.1	17	180	Dogs with Special Nutritional Requirements, Pregnant bitches: This is badly worded. Care should be taken not to overfeed throughout pregnancy. Only in the final 10 days should the quantity of food be increased, but bitches should be fed quality food throughout the pregnancy.	Text has been added to reflect this.
4.1.1	17	180	Dogs with Special Nutritional Requirements, Unweaned puppies: The magical '6 weeks' may be desirable, but it rarely works that way. This statement must be developed so that unsuspecting people do not force their bitch to continue feeding her brood.	The text now reflects that the optimum weaning point for a pup can depend on a number of factors.
4.1.1	17	29	Dogs with Special Nutritional Requirements, Growing Dogs: The veterinarians opinion is not the only opinion that should be considered. The breeders/owners opinion is often more relevant and correct.	This has been changed to 'expert advice'.

4.1.1	17	6	Dogs with Special Nutritional Requirements, Working Dogs: After the words 'Dogs should not be worked soon...' add words ' <i>before or</i> ' ... after a large meal.	Text has been added here to reflect this.
4.1.1	17	217	Dogs with Special Nutritional Requirements, Mention should be made here of desexed dogs who have a lower calorific requirement than entire animals. It may also be worth mentioning that overuse of food treats can lead to weight gain.	Information has been added to reflect that desexed dogs may have a lower calorific requirement than entire dogs.
4.1.2	17	211, 217	Risky Foods or Objects: Chocolate should be added to this list.	Information about the dangers of feeding dark chocolate to dogs has been added here.
4.1.2	17	6	Risky Foods or Objects: Add following text here (or at section 8.2): 'Gastric torsion has a number of causes and is by no means fully understood, however recent research has shown that increased feeding and the feeding of dried foods are both high risk factors. Dried foods encourage the dog to drink huge, unnatural, amounts of water that causes the dried food to expand in the stomach holding the heavy load of water in the stomach. Owners of dogs susceptible to gastric torsion should ensure that they are aware of the symptoms and that their veterinarian is familiar with the symptoms and treatment and has surgical facilities accessible out of hours'	Information about gastric torsion is included in section 8.2. It is considered that the information in this section is appropriate and no further detail is necessary.
4.1.2	17	6	Risky Foods or Objects: After the words 'Cooked bones...', add word 'old'...	Cooked bones can be problematic 'cooked and old' or simply 'cooked'. Therefore the term 'cooked' has been used alone here.
4.1.2	17	206	Risky Foods or Objects: Line 3 - Replace 'can' with 'could'.	Disagree. The word 'could' is more appropriate.

4.1.2	18	110,132,151,	Risky Foods or Objects: Add the word 'cooked' before 'chicken bones'.	The need to exercise caution when feeding cooked bones has been emphasized.
4.1.2	18	116	Body Condition, Intro: Maybe could include a reference to regular worming in relation to body condition for novice owners?	Information about the necessity of regular worming has been included in this section.
4.2	18	211	Body Condition, Intro: Suggests a greater emphasis on the serious risks of obesity. Suggested that the following paragraph is inserted 'Obesity poses serious health risks to dogs, predisposing them to such conditions as diabetes and heart disease. Excessive weight can also result in damage to joints, reducing mobility. The life expectancy of an obese dog is 25% less than that of a normal weight dog'. If this is accepted, RBP (b) should have its second sentence removed.	The risks of obesity have been outlined in the MS and in the RBP.
4.2	18	6,29,73,101,102, 106,107,108,113, 138,147,159,170, 171,175,176,181, 190,195,205,212,	Body Condition MS 2(a). Remove this on the basis that a number of breeds are naturally slim (greyhounds etc) and their body condition can vary according to their level of physical activity. (It should also be noted that dogs may be overfed as a result of this MS)	This MS has been revised to include additional physical and behavioural indicators of malnutrition.
4.2	18	226,211,	Body Condition MS2 (a): The issue of underweight dogs is something that the SPCA commonly has to deal with. The appendix to which Minimum Standard No. 2 refers is a severely shortened version of the commonly used Purina body condition scoring system.	The current body condition scoring system remains in the draft but the MS has been revised to include additional physical and behavioural indicators of malnutrition.

In the proposed body condition scoring system set out in Appendix 1 to the draft code there are five steps:

- 1 emaciated
- 2 thin
- 3 ideal
- 4 heavy
- 5 grossly obese

In the standard Purina body condition scoring system there are nine steps:

- 1 emaciated
- 2 very thin
- 3 thin
- 4 underweight
- 5 ideal
- 6 overweight
- 7 heavy
- 8 obese
- 9 grossly obese

Having a scoring system with only five steps will have a detrimental effect on the SPCA's attempts to warn or prosecute people who neglect to feed their dogs sufficiently. The owner or defence lawyer would only have to allude to the fact that the dog was merely thin (i.e. it wasn't ideal but it certainly wasn't emaciated) to have a defence under the Act.

Using the Purina scoring system with nine steps gives a larger range from emaciated to ideal, therefore allowing the SPCA to act before a dog reaches a critical condition and the owner consequently being taken to court for neglecting to supply a proper and adequate diet for their dog.

It is our experience that, in most of the prosecutions we undertake, the dogs are in the region of 30 – 35% below the minimum body weight for their age, sex and breed (i.e. about one third of their proper body weight if they were ideal). In most cases the dogs are in a thin to very thin condition; emaciated dogs are generally in the 40 – 50% below region.

The SPCA therefore strongly opposes the proposed five-step body condition scoring system and instead requests that it be replaced with the standard Purina nine-step system.

4.2	18	205	Body Condition MS 2(a). Some dogs are naturally slim, but a slim dog should be checked for ribs in case it actually does have an illness.	This would be apparent in the other indicators that have been added to the MS.
4.2	18	101,181,	Body Condition MS 2(a). A malnourished dog will exhibit more signs than just a lack of body condition e.g dull eyes, gaunt head, lack of muscle tone, dull coat and unhappy disposition. Suggests that MS2 should read 'Remedial action must be taken if, after evaluation and consideration of breed type, the body condition of a dog fails to comply with Appendix 1.'	This is encompassed in the rewording of the MS.
4.2	18	156	Body Condition MS 2(a). The NZGRA is seeking an amendment to cover racing greyhounds.	The rewording of the MS will cover racing greyhounds.
4.2	18	199	Body Condition MS 2(a). Many dogs have a period of high activity in adolescence and it is difficult to keep weight on at this point. This usually settles down after 2 years and they begin to put on weight.	It is recognized that growing dogs may have different nutritional requirements to adult dogs and information in regard to this is included in the paragraph 'growing dogs'.

4.2	18	127	Body Condition MS 2(a). The word 'thin' should be changed to 'emaciated'.	This would be apparent in the other indicators that have been added to the MS.
4.2	18	89,92,102,106,107,108,113,121,131,133,184,217,	Body Condition MS 2(a). Body conditions 'emaciated' or 'grossly obese' are conditions that require remedial action - 'Thin' does not always require action.	This is reflected in the rewording of the MS.
4.2	18	121,	Body Condition MS 2(a). Working dogs or those competing in sports such as agility should be slightly underweight to minimize the impact on bones and joints.	Information in regard to working dogs having a lower body weight is included in the introduction to this section.
4.2	18	122	Body Condition MS 2(a). Agrees with this MS.	Noted.
4.2	18	6,101,116,122,123,169,171,180,181,191	Body Condition GI: Disagrees with 'NAWAC comment for public consultation'. Disagrees that overweight dogs are of a lesser concern than underweight dogs. Problems due to being overweight may be more long term (e.g diabetes) and the dog may not be able to recover from these as easily as problems from being underweight. Suggests that NAWAC adds an overweight clause or removes MS 2(a).	MS2 b now addresses grossly obese dogs.
4.2	18	89,92,106,107,113,121,127,184,191,	Body Condition GI: Disagrees with 'NAWAC comment for public consultation'. Science has shown that lean dogs live longer.	MS2 b now addresses grossly obese dogs.
4.3	19	155	Water, Introduction: Access to good quality water is ' <i>essential</i> '.	The introduction states that good quality water is necessary and the MS states that it must be palatable.
4.3	19	24,169,180,	Water, MS3: Change MS to water available 'at all times' rather than 'access to water'.	Wording changed to 'appropriate access to water'. It is sometimes not practical to have water available at all times (e.g when a dog is working/travelling).

4.3	19	24, 86,89,92,101,108 ,116,121,131,147 ,150,176,181,184 ,217,	Water GI. 'While all dogs need daily water' should be changed to 'while all dogs need frequent access to water' or 'regular and sufficient' or similar	Wording changed to 'appropriate access to water'.
4.3	19	121,131,	Water GI. Dogs eating dry food will require more food than those on canned food or pet rolls.	This has been included in the text.
4.3	19	151	Water GI. Add the words ' or a raw food diet'. After the words 'those on canned food, pet rolls.'	The raw food diet has not been included in this code therefore the addition of this text is not appropriate.

Section 5. Containment, Tethering and Shelter

Pt	Pp	Submitter	Submission	NAWAC Response
5	20	214,211,	Containment, Tethering and Shelter: This section does not refer to the 'containment facilities' required for a breeding bitch.	This section covers all dogs in containment (including breeding bitches).
5.1	20	226	Containment, Tethering and Shelter: It is suggested that the introduction be reworded to "... and can potentially injure themselves, other dogs and people"	The text has been changed to reflect this.
5.1	20	91	Containment. MS4. A harness is better than a collar to contain a dog as a dog can easily slip a collar. A harness spreads the drag on the dog and does not pull on the neck.	The benefits of using a harness have been outlined in the general information section.

5.1	20	102	Containment. MS4. Add clause c) Dogs contained for over 5 hours on a regular basis should be kept in a kennel with an attached pen.	This minimum standard requires dogs to be contained in a way that does not cause distress. MS 14 requires adequate exercise.
5.1	20	206	Containment. MS4. Replace the word 'impeding' with 'restricting'.	Done.
5.1	20	48	Containment. RBP (a): States that he/she doesn't like keeping dogs indoors and therefore recommends that the words 'should be kept indoors' are removed and be replaced with 'provided with an outdoor run and kennel' only.	NAWAC disagrees. Keeping a dog indoors is acceptable as long as the requirements of all MS's are met.
5.1	20	102,181,211,	Containment. RBP (a). Remove ' <i>in urban situations</i> ' and insert words ' <i>on own property</i> ' (encourages people to have dogs out on streets off leash).	It has been accentuated in RBP(a) that the dog should remain on the owners own property.
5.1	20	180	Containment. RBP (a). Not only in the urban environment – a dog should be given the chance to roam free in any environment.	It has been accentuated that the dog should be kept under control at all times but can be allowed to roam free within a contained environment.
5.1	20	222	Containment. RBP (a). This RBP is inconsistent with that advised in the DCA (referring to sections 5(1) (b) and 52A of the DCA.	The wording of this RBP has been changed slightly to reflect that information contained in the DCA.
5.1	20	181	Containment. RBP (a). Suggest the addition of MS (c) 'Dogs should not be tethered by choke chains or other devices which tighten around the neck'.	Farmers use this technique in some cases to reduce the stress on young sheep when training a young dog. Therefore this cannot be included as an MS.
5.1	20	212,	Containment. RBP (b). This is necessary in some cases eg to reduce stress on sheep when training a young dog. Should be reworded to 'dogs must not be <i>routinely</i> tethered..'	See above.
5.1	20	73,102	Containment, c): 'Dogs not given exercise out of confinement should have a longer tether'. Strongly	This has been changed to 'dogs that are closely confined should be given adequate opportunity to exercise outside confinement'.

			disagrees with this statement and says that all dogs should have exercise.	
5.1	20	17,132,209,	Containment, GI: Small and medium breeds of dog require far less than 3 fingers worth of space between the collar and neck	This has been reworded to state that the collar must be tight enough to prevent escape but without chafing the dogs neck or restricting breathing.
5.1	20	67	Containment, GI: Should not being able to get to a fence of scalable height be made a minimum requirement?	MS (a) states that dogs must not be contained or tethered in a way that causes them injury or distress – this would cover this aspect of tethering.
5.1	20	180	Containment, GI: The statement ‘tethering can contribute to aggression’ has no scientific evidence to support this.	This statement has been expanded to say that minimal provisions for social interactions, exercise or stimulation can contribute to aggression in dogs.
5.1	20	195	Containment,GI: Many types of confinement can contribute to aggression – not just tethering.	As above
5.2	21	85,111,216	Shelter and Kennelling, Intro: In addition to night box, the word ‘crate’ should be used.	The word ‘crate’ has been added here.
5.2	21	154,183	Shelter and Kennelling, MS5(a): Kennels are guide dog services are designed to allow some draught and airflow so that dogs do not get too hot in summer months. Also it may be too difficult and unnecessary to make an enclosure draught free – the area may just require shelter from the wind and rain and from extreme temperatures. Text should be reworded to reflect this.	This has been reflected in the text and the MS’s.
5.2	21	93	Shelter and Kennelling, MS5 (b): This need to place dogs in crates at shows is a problem and consideration should be given to providing adequate enclosures at the larger showgrounds. Veterinary enclosures should also be provided, as there is nowhere to take a sick dog at the current time.	This comment has been noted by NAWAC

5.2	21	68,73,89,92,93,106,107,113,116,121,127,131,132,133,135,150,159,165,171,175,176,180,184,217,	Shelter and Kennelling, MS5 (c): Proposes that MS (c) be amended take into account that during showing and traveling dogs will be housed in crates overnight, for safety purposes, and will therefore be confined for periods longer than 8 hours. Dogs are removed regularly from the crate to be walked, providing them with the opportunity to urinate and defecate away from the crate. Dogs may also be confined indoors in a home overnight for periods longer than 8 hours, which an adult dog should, in most circumstances, have no problems with.	Confinement of dogs to a crate for periods of longer than 8 hours is ok as long as the confinement meets the requirements of all other MS's.
5.2	21	212	Shelter and Kennelling, MS5 (c): Disagree with this as it is inappropriate, the 'distance away from the sleeping area' is undefined and states that some dogs will sleep on their faeces.	NAWAC disagrees. Dogs should always be able to urinate and defecate away from their sleeping area.
5.2	21	169	Shelter and Kennelling, MS5: The following text should be added to the draft 'dogs must be provided with a sufficient amount of bedding necessary for comfort'.	An MS has been added to section 5 to reflect this.
5.2	21	209	Shelter and Kennelling, RBP (a): Change 'non absorbable' to 'non-permeable'.	This wording has been changed.
5.2	21	159	Shelter and Kennelling, RBP (b): Dogs housed outside may have access to shade and shelter, but not actually to their kennel.	Text has been added to reflect that dogs may have access to other forms of shelter.
5.2	21	91	Shelter and Kennelling, RBP: The minimum sizes presented for kennels are too big if the dog is in a large fenced garden area. Alternative cage sizes are given in this submission.	NAWAC disagrees. Sizes of kennels have remained as first stated and are recommended sizes only.

5.2	21	6,24,	Shelter and Kennelling, RBP: Sizes of runs and kennels presented in RBP are too small for RBP section.	NAWAC disagrees. Sizes of kennels have remained as first stated.
5.2	21	24	Shelter and Kennelling, RBP: Sizes presented for kennels and runs do not allow for situations where a dog is confined on a long term basis and both its shelter and exercise needs must be met.	Shelter and exercise requirements and recommendations in the code apply regardless of situation. This is recommendation for best practice only. Additionally, temporary housing code of welfare likely to cover this aspect.
5.2	21	29	Shelter and Kennelling, RBP: Cage sizes may be difficult to achieve in veterinary hospitals.	As above.
5.2	21	217	Shelter and Kennelling, RBP: Add 'Dogs should not be confined in a traveling crate or night box for more than 12 hours'	Covered by containment and exercise requirements and recommendations elsewhere in code.
5.2	21	205	Shelter and Kennelling: Farmers should be the main focus point for this section – many have dogs chained for long stretches and draughty uninsulated kennels, insufficient food etc.	The CoW applies to all dog owners.
5.2	22	206,211,	Shelter and Kennelling, GI: Suggested that this is amended to read – 'Avoid construction or painting kennels with materials that contain lead...'	This has been amended
5.2	22	48	Shelter and Kennelling, GI: Remove 'grass runs are acceptable... Sand and dirt based runs can be used....'. Neither of these methods can be completely sanitized and should not be used as a base for a dog run as they are more likely to attract infections than other bases.	NAWAC disagrees. Although these runs may be more prone to have the problems mentioned, they are still acceptable bases for dog runs. It is recommended that the 'site' is changed frequently.
5.2	22	217	Shelter and Kennelling,GI: Add that runs should be well drained.	This information is included.

5.2.1	22	212	<p>Shade and Ventilation: It is unreasonable to expect to ventilate an area and always provide access to shade for a working dog. Dogs need to travel in the back of the truck and be left in the back of the truck when the farmer goes to the store. Should be rewritten as 'areas in which the dogs are contained must be adequately ventilated and provide access top shade when not to do so would cause them distress'.</p>	<p>The MS has been reworded to take into account that dogs may be left in the back of a truck or in other situations required when working on occasions, but steps must be taken to ensure that the dogs experiences no distress when this is done.</p>
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Section 6. Sanitation.

Pt	Pp	Submitter	Submission	NAWAC Response
6	24	48,169,180,216	<p>Sanitation, MS7: Change wording of MS7(a) to read 'Contaminated bedding, faeces and urine must not be permitted to accumulate to the extent that they pose a threat to the health and welfare of dogs <i>or people, and must be disposed of on a daily basis.</i></p>	<p>The fact that they should be disposed of on a daily basis has been included as an RBP. The accumulation of waste products must not pose a threat to the health and welfare of dogs under MS7 (a).</p>
6	24	224	<p>Sanitation, MS7: It is recommended that (a) be reworded to read "Faeces and urine must not be permitted to accumulate, including in bedding, to the extent that it poses a threat to the health and welfare of dogs".</p>	<p>This is reflected in the text of the MS.</p>
6	24	181	<p>Sanitation, MS7: Define 'accumulation'.</p>	<p>There is no need to define the word 'accumulation' as the focus of this MS is that there is no risk to the health and welfare of the dog.</p>
6	24	91	<p>Sanitation, GI: Dogs can chew plastic containers. The cheap ones are not made for NZ conditions and become brittle and very dangerous should the dog decide to chew them.</p>	<p>This information has been added to the text.</p>

Section 7. Breeding.

Pt	Pp	Submitter	Submission	NAWAC Response
7	25	195	Breeding: Define the words 'disorder' and 'reasonable efforts' as used in this section.	Dictionary / commonsense definitions apply. 'Inherited disorders' is a recognised term and there are lists of known inherited disorders available. Sources of information have now been listed in the code.
7	25	211	Breeding: The Companion Animals Society believes that more emphasis should be put on testing for heritable diseases. Although there are a large number of disorders there is now ready access to a large number of genetic tests through laboratories in Australia and New Zealand and through schemes already in place in NZ. Breeder ignorance is not an acceptable excuse. Breeders should be knowledgeable about diseases their breeds are susceptible to and where testing of parents is not carried out purchasers of puppies should be made aware of this.	Comment acknowledged by NAWAC
7	25	206	Breeding, Intro: Amend the first sentence to read '...appropriate education of owners whose dogs have not been neutered'	This has been included in the general information.
7	25	48, 89,92	Breeding, Intro: Problems arising from the breeding of dogs can be avoided by appropriate education of potential breeders prior to commencement. Suggestion that potential dog breeders could undertake a course such as that offered my Massey University on canine behaviour and care.	Noted. Can be addressed in support material produced when code is issued.

7	25	183	Breeding, Intro: Education can reduce problems associated with breeding – but not avoid them altogether.	The issues associated with unplanned and unwanted litters has been addressed in this section. Education is not an instant cure, but can help.
7	25	211	Breeding, Intro: Change last sentence to 'To prevent unwanted breeding, dogs should not be allowed to mate. This is most easily achieved through desexing'.	This section has been reworded to reflect this.
7	25	212	Breeding, MS8: Several key terms should be defined including 'reasonable efforts' and 'inherited disorders'. Substantial compliance costs are likely to be incurred in screening animals. This MS should be placed in the RBP section and reworded.	Animals do not necessarily have to be screened, although this is increasingly being encouraged by the veterinary and dog breeding professions.
7	25	195	Breeding, MS8: This statement does not actually refer to welfare or even distress. Not all disorders or their effects are necessarily stressful.	All disorders reduce the quality of life for the dog or have the potential to reduce the quality of life for future litters. Dogs having 'disorders' should therefore not intentionally be chosen to breed.
7	25	29,48,73,86,101,102, 141, 146, 163,165,180, 181,195, 216,	Breeding, MS8: This MS seems to be directed at 'pure-bred' dogs only. Inherited problems are also passed on to cross-bred dogs including 'designer dogs' (for which demand is on the increase) and the cross breeding of pure breeds both intended and accidental. This may cause problems in enforcing this MS. The potential to double up on genetic faults through the increase in 'designer dogs' also has potential to cause an increase in other physical problems such as coats that are difficult to groom. Considers that there are serious welfare implications for cross breed dogs, whether they are born for monetary gain or as a result of an accidental mating, or are bred solely on their ability to perform farm work (in which genetic history is often not considered), rather than the continuation and improvement of a breed. Include a reference to both pure and cross bred dogs in the MS or delete the clause.	Noted. MS applies to purebred and crossbred dogs.

7	25	68, 101, 116, 127, 133,138,155, 171,181, 205,217	Breeding, MS8: Due to the uncertain nature of genetics the current wording is not practical or realistic. To achieve dogs free of all hereditary faults is the aim of all health schemes but it has not been achieved at this time. In progressing towards this goal, varying degrees of any such condition in breeding animals has to be acceptable and regarded as being part of the process. This is not recognized by the words 'free from all faults' and this requires amendment to make the wording less strong. Testing is useful to avoid problems, but not a complete answer. MS should maybe be made into a RBP. Or text should be changed to 'as far as it is able to be verified free of faults'.	The wording 'free from all faults' is not in this MS. This MS requires all reasonable to be made to ensure inherited disorders are not replicated. NAWAC considers this to be appropriate. The wording 'free from faults' is deleted in general information (see below).
7	25	101,170,180, 181,	Breeding, MS8: Any conscientious breeder of pure bred dogs will research the genetic make up of both sire and dam prior to breeding, as noone wants to intentionally produce puppies that have an inheritable disorder.	NAWAC has acknowledged this point.
7	25		Breeding, MS8: Suggests breeders should have to qualify and be licensed. Breeding of non-pedigree (cross breeds) should be limited to specific registered working and sporting groups where a breeding register is compiled. This MS does not limit who can breed.	NAWAC considers this inappropriate at this time and not essential to protect animal welfare.
7	25	91	Breeding MS8: All breeds may have inherited disorders, who is to publish this list of inherited disorders in dogs?	These lists are already available. Information on where to find them has been placed in the code.
7	25	112,127,135, 165,170,176, 181,	Breeding, MS8: Breeders do not wish to have faults in their breeds but some genetic disorders such as hip dysplasia cannot be determined by scoring the sire and dam only. Recessive genes can make some breeding stock carriers of faults that lie dormant for many generations.	Noted. The wording refers to 'reasonable efforts' and is considered appropriate.

7	25	93	Breeding, MS8: Agrees with fact that breeder should be responsible for the overall health and genetic make up of the dog. If a purchase is made and the dog is found to have an inherited disease the breeder should be liable for prosecution. They must refund the cost to the purchaser or replace the animal at own cost.	This is covered by the Consumer Guarantees Act. The requirements laid out in this minimum standard have legal effect under the Animal Welfare Act.
7	25	165	Breeding, MS8: New diseases are still being discovered that older stock was never tested for.	Noted.
7	25	178	Breeding, MS8: Is the testing done before purchase of the dog or before the breeding of the dogs?	There are minimum standards relating to breeders and relating to supply of puppies. The requirements around the supply of puppies refer to disclosure of inherited disorders known in a breed, not present in an individual.
7	25	116	Breeding MS8: Environment and levels of care are contributing factors in many disorders for which a breed may have a genetic disposition.	NAWAC recognises that breeds have a propensity for inherited disorders – this does not mean that every individual of a breed will carry or show that disorder.
7	25	150	Breeding MS8: (also see section 7.2). This MS should specify a minimum and maximum age at which bitches may have litters, a maximum frequency of litters (eg per annum) and a maximum lifetime number of litters.	The RBP states the ages (min and max) at which veterinary advice should be sought prior to mating. No maximum number of litters is currently given.
7	25	178	Breeding MS8: The every day person breeds dogs – how do they assess the genetic make up of a dog if they don't know where it came from?	The responsible breeder should be aware of the risks and should research their dog's histories prior to making the decision to breed.
7	25	68,91,135,	Breeding RBP: Suggests that RBP wording be amended to reflect that testing is only performed for specific inherited disorders (i.e those the dog may be predisposed to) rather than all disorders. Also may need to consider the length of time that the disorder be absent in one line of dogs before it is considered no risk and therefore is not necessary to test for prior to breeding.	This should be self-evident and will be advised at the time when testing is sought.

7	25	89,92,217	Breeding, RBP: Breeders should gain as much information as they can about their dogs prior to breeding. Breed societies of the breeds most at risk from inherited disorders operate schemes which enable early detection and identification by carriers, by trace back if applicable, so that only dogs <i>'that are unlikely to pass inherited disorders to their offspring are used for breeding'</i> .	Code amended accordingly.
7	25	158	Breeding, RBP: There is no DNA testing facility for dogs in NZ at the present time.	The code notes that testing is only available for some inherited disorder.
7	25	181	Breeding, RBP: To what extent must breeders go to test their dogs? If the test for a specific disorder is not available in NZ – must they send samples overseas to get it done?	The RBP notes that testing should be undertaken where available. It is expected that breeders would make a reasonable effort to test breeding stock.
7	25	178	Breeding RBP: Many breeds have inherent disorders; the suggestion of testing will eventually stop many pedigree breeds from existing.	Controlled breeding will reduce the incidence of these disorders. If the breed does not exist without associated disorders (e.g restricted breathing due to a flatterned face etc), consideration would have to be given to whether breeding these animals is advantageous for the welfare of future animals.
7	25	101	Breeding, GI: Retinal atrophy has no data base in New Zealand so why is it named here?	This is a noted inherited disorder in some breeds. This text was not commented on by the New Zealand Kennel Club or the New Zealand Veterinary Association.
7	25	106,107,111, 113,121,131	Breeding, GI: The phrase 'Ensuring that there is a market for the offspring prior to breeding will reduce the population of unwanted dogs' should be deleted.	Disagree.
7	25	106,107,113, 121,131, 175,	Breeding, GI: Remove words 'free of the faults and' should be deleted and the word 'them' should be replaced with the words 'inherited disorders'.	Code amended accordingly.

7	25	181	Breeding GI: Remedy is already available for owners who find their dogs suffering from chronic inherited disorders in the Consumer Guarantees Act.	This information has been added to the CoW.
7	25	214	Breeding: Suggest adding to this section 'Breeders must make all reasonable efforts to ensure that breeding decisions do not compromise the dogs' conformation or welfare in order to meet the extremes of breed standards.'	Noted, but NAWAC considers that welfare is adequately protected by current minimum standards and recommendations for best practice.
7	25	226	Breeding: The SPCA fully supports this standard and congratulates NAWAC on its inclusion. The issue of inherited disorders in dogs is of concern to the SPCA and we believe the path taken in the code is appropriate.	Comment acknowledged by NAWAC.
7.1	25	199	Desexing: Prefer that new owners should be informed of the potential consequences of owning an entire dog and of the ethical responsibilities involved in choosing to breed from a dog. If kept under proper control, entire dogs should cause no more difficulties than desexed ones; it is when they are allowed to roam inappropriately that the problems occur.	This is covered in the 'breeding' section (section 7).
7.1	25	205	Desexing: Decision should be left to each individual owner.	The decision is left to each owner, but it is recommended that dogs that are not to be used for breeding are desexed to ensure the welfare of the dog (and future litters).
7.1	25	73	Desexing: There is no mention of show dogs in this section.	This section applies to all dogs.
7.1	25	149,162,189	Desexing: This procedure is non-essential - why is this recommended when it is far more painful than tail docking, which is being banned.	This procedure is performed with pain relief and has the long term gain of reduce the number of stray dogs.

7.1	25	195	Desexing: There are other ways to encourage de-sexing such as council fees.	A reduction on council fees are in place for desexed dogs, but it is helpful to outline the reasons for desexing a dog here too.
7.1	25	226	Desexing: The issue of indiscriminate and unplanned breeding leading to an excess of unwanted animals finding their way into SPCA shelters, to the extent that many have to be euthanased, is the single biggest issue the SPCA confronts. The SPCA advocates that the code should be aligned with the Companion Cats Code of Welfare 2007 on this issue and the first Recommended Best Practice reworded to “Dogs, other than those kept by a registered breeder for breeding purposes, should be desexed at or before puberty”. We also advocate that a further two recommended best practices be added, namely “Dogs sold from a pet shop or rehomed from an animal welfare shelter or rehomed from a local authority pound should be desexed before sale/adoption” and “Veterinarians, pet shops, cat breeders, local councils and animal welfare organisations should continually encourage the desexing of dogs in the community”.	NAWAC acknowledges this comment. Dogs sold from an animal shelter are desexed at the present time and this is also encouraged by veterinarians etc. This is outlined in this section
7.1	25	110,115,132,	Desexing RBP (a): Desexing an animal before puberty can cause mental problems as dogs are not fully mature at 6 months of age.	Noted. This section reflects latest science and veterinary thinking.
7.1	25	115,132,158, 176	Desexing RBP (a): States that desexing too young will inhibit maturity. A bitch should have a season and the male should be >6 months of age.	Noted. This section reflects latest science and veterinary thinking.
7.1	25	205	Desexing RBP (a): Immature desexing will increase wear and tear on joints during agility competitions.	Noted. This section reflects latest science and veterinary thinking.
7.1	25	205	Desexing RBP (a): Early desexing causes dogs to put on weight.	This can be controlled by diet modification and should not be a reason not to desex a dog.

7.1	25	23,73,85, 89, 92, 94,101, 102,106,107, 108,113,121, 131,133,138, 155,158,162, 171,175,176, 180,181, 183, 195, 205,217	<p>Desexing RBP (a): Does not support the inclusion of the statement that all dogs not intended for breeding should be desexed before puberty as:</p> <ol style="list-style-type: none"> 1. you cannot always be sure that you do not wish to breed your dog by this point and 2. early desexing may affect other aspects of the dogs health, many aspects of which are outlined in the GI section. Much of this information is hotly debated in the veterinary arena and should therefore not be printed as fact. Many issues that are debated including 1. changes in behaviour in response to desexing (an aggressive bitch may become more aggressive after spaying), 2. urinary incontinence in both bitches and dogs after spaying and as they reach old age, 3. changes in bone maturation and the potential dogs predisposition to other health risks that could otherwise be avoided by waiting until the dog is physically mature. Does not agree this information being presented as correct as it is not agreed upon by many specialists. (Submission 94,101,108,162 and 181 have included a paper/text outlining arguments for neutering/not neutering dogs). <p>Many of these submissions appreciate the reasons for why neutering is recommended at an early age but consider that the physiological soundness of a dog should be the main consideration.</p>	Noted. This section reflects latest science and veterinary thinking.
7.1	25	183	<p>Desexing RBP (b): Believes that this RBP would mean that some dogs would never be mated if this RBP was followed, eg german shepherd dogs that are predisposed to develop hip dysplasia</p>	Controlled breeding will reduce the incidence of these disorders. If the breed does not exist without associated disorders (e.g restricted breathing due to a flatterned face etc), consideration would have to be given to whether breeding these animals is advantageous for the welfare of future animals.
7.1	25	86,180	<p>Desexing RBP (b): Define 'fault' in this RBP.</p>	Fault can alternatively be described as an 'inherited disorder' for the purpose of this RBP (this can be seen from section 7)

7.1	26	211	Desexing RBP (c): Suggest 'Dogs and bitches should not be kept together when the bitch is in oestrus'.	Text remains as 'if there is a risk of accidental mating' as it is not always easily possible to determine when a bitch is in oestrus.
7.1	26	217	Desexing GI: Delete paras 3 and 4 and replace with 'veterinary advice should be sought with regard to the recommended age for desexing'.	NAWAC disagrees. Veterinary advice should be sought in regard to desexing a dog which is not required for breeding purposes.
7.1	26	206	Desexing GI: Last sentence 'rates of desexing can improve' should be replaced with 'better population control will be achieved' or 'the surplus of unwanted dogs will decline'.	This information is reflected in the general information.
7.2	26	183	Bitches in heat and mating, RBP (bii): Disagree with this comment and believe that it is more welfare minded to mate a bitch on its first heat.	NAWAC disagrees
7.2	26	199	Bitches in heat and mating, RBP (bii): Can see no reason why bitches who have their first heat late (after 18 months of age) should not be mated at that heat.	Noted.
7.2	26	29,116,183,2 17,221	Bitches in heat and mating, RBP (biii): Breeding may be acceptable at 7 years of age if bitch is healthy, active and has no other problems. Many breeds are in their prime at this age. Increase this age limit?	Veterinary advice is advisable in this case.
7.2	26	132	Bitches in heat and mating, RBP (biii): UK and NZ kennel club code of conduct suggests that whelping is not recommended after 8 years of age.	Suggests veterinary advice should be sought after 7 years of age.
7.2	26	156	Bitches in heat and mating, RBP (biii): Suggests text is changed to 'when bitches are mated beyond seven years of age veterinary advice should be sought'.	Text has been changed to reflect this.
7.2	26	214	Bitches in heat and mating, RBP (biii): Recommend that this is changed to 'The dog will not breed beyond 2/3 of the life expectancy recorded in their recognized	It is clearer to state that veterinary advice should be sought after 7 years of age. The fact that only 4 litters can be registered is not relevant to this CoW.

breed standard without approval' or 'Only 4 litters will be registered by NZKC in the life of a bitch'. None of these recommendations will address the issue of puppy farmers however and registered breeders will be most affected.'

7.2	26	183, 221	Bitches in heat and mating, RBP (d): Recommends that bitches should be mated from the first heat and on consecutive seasons from then on and then spayed as soon as they are not needed further as a brood bitch. The quicker that the allocated number of litters have been produced, the sooner a bitch can be spayed and this would lessen her chances of developing uterine pathology.	NAWAC disagrees. The bitch should be given the opportunity to become fully mature prior to having a litter, and thereafter the body should be rested between litters.
7.2	26	85,115,156,	Bitches in heat and mating, RBP (d): Does not agree with this RBP. Provided a bitch is in good health and condition there is no reason why she can't be mated on consecutive seasons. Submission 156 states that it is not recommended to mate on three consecutive seasons.	NAWAC disagrees. The body should be given the opportunity to rest between litters.
7.2	26	101	Bitches in heat and Mating, RBP (d): Suggests that this section should include a minimum standard to prevent this aspect of breeding being subject to abuse. It is common knowledge that people in various occupation categories take litters from bitches every season. These dogs should be provided with a MS reading ' <i>Bitches must not be mated on consecutive seasons except in exceptional circumstances.</i> '	Noted. Code not amended since bitches can be mated on some consecutive seasons if carefully managed.
7.2	26	110	Bitches in heat and Mating, RBP (d): It some cases there is only a small window of opportunity for breeding bitches so in some instances back to back matings are needed. An experienced breeder will be able to judge this.	Noted.

7.2	26	116	Bitches in heat and Mating, RBP (d): Should read 'Bitches should not be mated so as to whelp and rear litters on consecutive seasons'. All matings do not end in the litters being born. In this case a bitch may be healthy to be mated again after a few months.	This information has been included.
7.2	26	199	Bitches in heat and Mating, RBP (d): Agrees with this statement in most circumstances but there may be exceptions 1. when healthy bitches of the larger breeds have only one or two puppies in a litter they can be safely mated on the next season, 2. if the bitches cycle is longer than the normal 6-9 months (as in basenjis and some other breeds) she can have litters on successive seasons, 3. suggests that this should be best put in terms of time (i.e no of litters per year dependant on the size of litters).	Noted but consider current recommended best practices sufficient.
7.2	26	209	Bitches in heat and Mating, RBP (e): It is noted in relation to recommended best practice 7.2(e) that Manukau City Council's Dog Control bylaw states owners must ensure their dog does not enter or remain upon any public place or any property other than that of the owner of the dog. The exception is where the dog is taken to another property with the consent of the occupier or to be taken to a vet. No specific amendments are sought, as the recommended best practice is not inconsistent with the bylaw.	Comment has been acknowledged by NAWAC
7.2	26	116	Bitches in heat and Mating, RBP (f): This RBP might require the following text to be added 'In the case of bitches, these treatments should precede mating, unless under veterinary advice'. This is to prevent a novice breeder giving unsuitable treatment to a pregnant bitch and causing harm to the litter.	The information has been added to this section.

7.2	27	183,221	<p>Bitches in heat and Mating, GI: Suggest that the veterinarian does not need to be consulted after a misalliance as treatment with oestrogens is contraindicated from a welfare point of view. (Treatment with oestrogen administration can cause problems such as bone marrow suppression.) Instead, the bitch should be seen at LH30 to confirm that she is not pregnant (60% of cases are not). If she is pregnant then humane methods of termination can be discussed. A vet would only be able to take a swab to see if sperm is present and assess the likelihood of a bitch being pregnant by her stage in oestrus. This is not an emergency procedure.</p>	Should be left to veterinarian's discretion.
7.2	27	199	<p>Bitches in heat and Mating, GI: The statement 'the scent produced by bitches in heat can attract dogs from far away' is only true if the bitch leaves the property on foot, allowing dogs to follow her tracks home. There are many published studies on this.</p>	The result remains the same, that a bitch should be carefully confined while in heat so that unplanned matings do not occur. Additional information in relation to the bitch leaving scents (how, when, at what distance etc etc) would add confusion here.
7.2	27	199	<p>Bitches in heat and Mating: The clause does not mention health tests. Considers that it should be stated that bitches should not be mated before the results of and breed relevant health tests such as hip scores have been obtained.</p>	This is outlined in the 'breeding' section (section 7).
7.3	27	101	<p>Pregnancy, Whelping and Lactation, Intro: An emphasis on the importance of the frequency of litters has been deleted by NAWAC from the introduction to this section. The deletion read 'Breeders of dogs should consider the frequency at which individual dogs are used for breeding and the age at which breeding commences'. Concern that NAWAC is deliberately disregarding the welfare of brood bitches by these deletions.</p>	This material is covered in recommended best practices.

7.3	27	73,91,102	Pregnancy, Whelping and Lactation MS9: Inspected by whom?	Inspected by the owner or person in charge (someone who knows that the dog is pregnant) to see that she is not experiencing difficulties.
7.3	27	209	Whelping MS: The Manukau City Council has considered the draft code in terms of its impact on dog management policies and practices developed under the Dog Control Act 1996. In particular, any impact on the operation of the Manukau City Council and Papakura District Council Animal Management Shelter, Dog Control bylaw, enforcement of welfare and containment provisions of the Dog Control Act 1996, and Responsible Dog Owner and Multiple Dog Owner (3 or more dogs) programmes. Minimum standards in the draft code must not be inconsistent with provisions of the Dog Control Act 1996 and Dog Control bylaw, and would be beneficial if they assist in providing further definition. The Council would also want to ensure it meets the minimum standards in its operation of its animal shelter. Manukau City Council strongly recommends that Minimum Standard No.9 (Whelping) be amended. Provided this amendment is made, Council does not consider there would be any costs to comply with the minimum standards.	MS 9 (whelping) has been amended
7.3	27	180,181,	Whelping MS: This whole section is well wide of the mark and bitches can vary immensely in terms of the time they take to whelp.	This has been changed to state that bitches must be inspected frequently.
7.3	27	205	Whelping MS (a): How is this MS to be policed?	It is enforced in the same way as the other MS's in the CoW.
7.3	27	85,89,92,102,106,107,113,121,131,133,155,171,175,	Whelping MS (a): Bitches should be inspected at a minimum of every 4 hours, not 6 hours.	This has been changed to state that bitches must be inspected frequently.

7.3	27	111,127,	Whelping MS (a): Bitches should be inspected at a minimum of every 2 hours, not 6 hours.	This has been changed to state that bitches must be inspected frequently.
7.3	27	209	Whelping MS (a): Bitches should be inspected frequently.	This has been changed to state that bitches must be inspected frequently.
7.3	27	86,101,112,138,	Whelping MS (a): Change 'bitches close to whelping must be inspected once every 6 hours' to 'a bitch must be under constant supervision when close to whelping'. Setting a specific time period at which to inspect whelping bitches is unacceptable. Suggests that 'a) Bitches close to whelping must be supervised' and b) Veterinary assistance must be sought if there are whelping difficulties	This has been changed to state that bitches must be inspected frequently.
7.3	27	154,183,	Whelping MS (a): Whelping should be supervised but it should be recognized that excessive supervision can increase the incidence of still born puppies – some dogs are more sensitive to this than others. Indirect supervision can be provided by a video link to another room.	This has been changed to state that bitches must be inspected frequently. It is considered that, in the majority of cases, frequent observation will benefit the dog more than would too little supervision. Not all breeders have access to video technology.
7.3	27	102,217,	Whelping MS (a): Define 'close to whelping'. Bitches can whelp 2 days early and with cross bred mismating owners may not even know when a bitch is due to whelp.	It can be determined if whelping is imminent by monitoring the bitches temperature.
7.3	27	205	Whelping MS (a): A bitch is close to whelping as evidenced by a sharp drop in temperature – after which it should not be left unattended.	This information has been added.
7.3	27	212	Whelping MS (a): It is not possible for farmers to monitor the imminent onset of whelping as they are too busy working or sleeping. Would be better to put this in the RBP section.	The MS's state the very basic level of care for dogs. Farmers should comply with MS's to ensure the welfare of their working dogs.

7.3	27	86	Whelping MS (b): Define the onset of 'whelping' – i.e. at what point does this officially commence?	Whelping has been defined in the glossary. The MS defines that veterinary assistance should be sought during whelping if contractions have been occurring for 2 hrs and no pup has been produced.
7.3	27	68	Whelping MS (b): Proposes that 'two hours' be changed to 'four hours' on the basis that vets often ask for 4 hours to pass prior to attending a delayed whelping.	NAWAC disagrees. Veterinary assistance should be sought (by phone or otherwise) after 2 hours.
7.3	27	135	Whelping MS (b): The words 'two hours' should be changed to 'if the bitch has not managed to pass a puppy after two hours, veterinary advice should be sought'. This is to clarify that it should be the act of 'passing the puppy' that should be given attention after 2 hours - labour can last for 24 hours or more.	The MS has been changed to reflect this.
7.3	27	183	Whelping GI: The length of gestation is sixty five days +/- 1 day post LH surge (as determined by progesterone assay) or 63 days +/- 1 day after ovulation.	This is useful information, but too much detail for a CoW as most people would not have the resources to assess this.
7.4	28	101	Weaning and Removal of Puppies MS10: This section is confused given that weaning and supply of puppies are two totally different processes. Weaning begins at 3 weeks of age and the dam is unlikely to be with the puppies full time after 5 weeks of age, but socialization with the dam is still important after this as too sudden a withdrawal of pups can be upsetting for the bitch and lead to uncomfortable and caked mammary glands. It is submitted that clause 7.4 (b) should read ' <i>Puppies should have access to the dam for as long as she will tolerate them</i> '. In addition it is submitted that a specific weaning MS be introduced reading ' <i>Weaning must not be commenced before 21 days of age except in an emergency situation</i> '.	NAWAC has considered that these two processes are integrated and so should remain in the same section. Information has been included that the pups should be given access to the dam until 6 weeks of age, except where this will be detrimental to her welfare.

7.4	28	205	Weaning and Removal of Puppies MS10: Pet shops, and in particular, puppy farmers, should be banned from selling puppies and increasing the number of crossbred pups with no regard for soundness.	This is enforced by MS 8 which aims to reduce breeding with no regard for soundness (Section 7)
7.4	28	211	Weaning and Removal of Puppies MS10 (a): Suggest that this is reduced to 6 weeks. It is common practice to sell or Rehome pups from this age in both rural and urban situations. One veterinarian reports that many of his clients will be in breach of the MS. Suggest that 8 weeks could be an RBP?	NAWAC considers that 6 weeks is too young to rehome a puppy. Many pups have just begun weaning at this point.
7.4	28	214	Weaning and Removal of Puppies MS10 (a): It is generally recognized that 8-12 weeks is the 'fear' period and it is not recommended that there are any traumatic events during this stage of the pups life (including rehoming). Pups should therefore be rehomed at 7 weeks of age.	Code amended to make this an appropriate RBP.
7.4	28	48,85,89,92,101,102,104,106,107,111,113,115,121,131,150,154,155,180,183,	Weaning and Removal of Puppies MS10 (a): Change wording from '..at least 8 weeks of age' to 'at least 7 weeks of age' – many readings have promoted this as the ideal time to relocate a puppy. (This allows time for the puppy to be socialized by its new owner before the window of opportunity closes).	Code amended to make this an appropriate RBP.
7.4	28	132	Weaning and Removal of Puppies MS10 (a): Agrees that 8 weeks should be a minimum	Disagree. Science confirms that earlier rehoming is possible and can be desirable.
7.4	28	158	Weaning and Removal of Puppies MS10 (a): Wishes that this is changed to a minimum of 12 weeks of age.	Disagree. Science confirms that earlier rehoming is possible and can be desirable.
7.4	28	101,170,181,195	Weaning and removal of Puppies MS10 (a): In regard to supply of puppies and optimum age of removal to a new home, much depends on the maturity of the individual puppy as they can vary in rate of development	Information has been included in the Code that the puppies must be capable of independent life before they are moved to a new home.

due to a number of influences. The optimum time for removal will therefore be dependant on the breeders knowledge and the maturity of the puppies that will determine the optimum time for each pup to leave the litter. This cant be set in an MS.

7.4	28	86,101,181,	Weaning and Removal of Puppies MS10 (a)i: Finds MS (a) ambiguous. An orphaned puppy is no different to any other puppy and should not be rehomed or sold before the age stated in the MS.	This MS has been reworded to clarify this.
7.4	28	29	Weaning and Removal of Puppies MS10 (a)ii. Early removal of puppies from a bitch can also be deemed necessary by an experienced breeder	Minimum standard retained to avoid allowing inexperienced breeders to make this decision.
7.4	28	91,123,	Weaning and Removal of Puppies MS10 (b): Will the SPCA have to comply with this MS?	If any information in regard to the inherited disorders that an individual dog possesses is known to the SPCA, they must disclose this information.
7.4	28	29	Weaning and Removal of Puppies MS10 (b): The term 'People' should also include pet shops, SPCA, shelters etc.	The term 'people' applies to all suppliers of puppies.
7.4	28	73,	Weaning and Removal of Puppies MS10 (b): Considering that so many cross bred pups are given away without veterinary contact or record of date of birth, this may be difficult to implement. Or is this just aimed at NZ Kennel Club breeders? Due to the difficulties in implementation this MS may be best to be included as a RBP.	If any information in regard to the inherited disorders that an individual dog possesses is known to the supplier, they must disclose this information. It may not be known by the supplier what the inherited disorders are in dogs of unknown origin, and this is fact is acknowledged by NAWAC. However, to comply with this MS, all known information must be supplied to the new owner.
7.4	28	85, 102,106,107, 113,171,176, 180,	Weaning and Removal of Puppies MS10 (b): These standards must address cross bred dogs as well as pure bred dogs.	These standards apply to all dogs.
7.4	28	91	Weaning and Removal of Puppies MS10 (b): What is supplying a puppy? May have to consider factors such	If any information in regard to the inherited disorders that an individual dog possesses is known to the supplier, they must

			as dogs that are given as gifts or are inherited. Information may not be passed on to the owner directly. Gifting, inheriting etc?	disclose this information. It may not be known by the supplier what the inherited disorders are in dogs of unknown origin, and this is fact is acknowledged by NAWAC. However, to comply with this MS, all known information must be supplied to the new owner. This MS has been reworded to read 'any known inherited disorders which may cause health and /or welfare problems during the dog's lifetime.
7.4	28	102	Weaning and Removal of Puppies MS10 (b): Replace the words ' <i>known in a breed</i> ' with ' <i>known within a breed or within the parents and parentage</i> '	
7.4	28	48	Weaning and Removal of Puppies MS10 (b): Must breeders disclose all possibilities of disorders in their dog breed, even if they are not known to have occurred in this particular bloodline or in NZ?	It is intended that breeders disclose all known disorders that could possibly occur in the individual dogs that they are supplying.
7.4	28	178	Weaning and Removal of Puppies MS10 (b): The average person does not know of the inherited disorders in any breed.	NAWAC disagrees. Anyone planning to breed a dog should perform research prior to mating.
7.4	28	104,123	Weaning and Removal of Puppies MS10 (b): It is impractical for breeders to disclose all inherited disorders known in a breed. It is only practical to list the most common.	There is information on known inherited disorders that can be expected in particular breeds. Otherwise, breeders should undertake their own research on what disorders can be expected in their individual dogs.
7.4	28	29, 86	Weaning and Removal of Puppies MS10 (b): How far into the dog's lifetime should a person be expected to disclose such disorders? Is it reasonable to be able to predict what could happen in 5 years time? – could cause problems under the Consumer Guarantees Act 1993. In addition, this clause could be used by someone whose aged dog develops a relatively minor old age related disease, to sue the breeder for veterinary expenses etc. There are many age related diseases in which it would be impossible to state if the disease was hereditary or environmental. Who is going to decide what are inheritable diseases are what aren't?	There is information on known inherited disorders that can be expected in particular breeds. Otherwise, breeders should undertake their own research on what disorders can be expected in their individual dogs.

7.4	28	226	Weaning and Removal of Puppies MS10 (b): The SPCA submits that (b) be reworded to read "... any known genetic disorders which may cause ...".	This MS has been reworded
7.4	28	180	Weaning and Removal of Puppies RBP (a): Breeders do not need veterinary advice when supplementing feed.	This remains as a recommendation for best practice. Not all breeders are experienced in dog nutrition. The misuse of supplements can cause health and welfare problems in dogs.
7.4	28	116	Weaning and Removal of Puppies RBP (a): Supplementary feeding is not uncommonly performed when puppies need 'topping up' with bottle feeding perhaps until the mother accepts them after a caesarean birth or in the case of a large litter. It is the breeders aim to keep the puppies with the dam if possible, even if the majority of the milk is not coming from her. Extra milk is only given if really necessary as it is a huge amount of work for the breeder.	It is outlined in the text that supplementary feeding is performed in circumstances where the bitch is unable to supply adequate milk.
7.4	28	101	Weaning and Removal of Puppies, RBP (b): Reword to ' <i>Puppies should not be fully weaned from the dam before 28 days of age, and the mother should be able to visit her pups daily until the pups are 6 weeks of age.</i> ' This is proposed on the basis of that when the pups are 4 weeks of age, the dam is quite happy to leave them for some time with regular visits, but socialization is a very important factor in raising temperamentally sound pups.	Information has been included in the text stating that the pups should be given access to the dam for 6 weeks (as long as it is not detrimental to her welfare).
7.4	28	154,183,	Weaning and Removal of Puppies, RBP (b): Provisos could be added to this such as 'they should not be removed unless the bitch shows excessive aggression to the pups' or 'the pups needed to go to another bitch due to lack of milk' or if 'the presence of the pups would be detrimental to her health'.	This information has been included in this section.

7.4	28	180	Weaning and Removal of Puppies, RBP (b): Many bitches do not want a bar of their pups by 28 days as they have very sharp teeth.	The pups will be given access but if the dam doesn't want the pups near, then this will be classed as 'detrimental to her health'. Therefore, this information is included in this section.
7.4	28	183	Weaning and Removal of Puppies, RBP (b) and (c): These two points slightly contradict each other.	These have been reworded.
7.4	28	183	Weaning and Removal of Puppies, RBP (c): Use of different terms for the female (dam and bitch) in this point.	This point has been deleted and integrated into the text.
7.4	28	101	Weaning and Removal of Puppies GI: The point which is made under GI stating that ' <i>owners of puppies to be rehomed need to be satisfied that the puppies are capable of independent life before moving them to new homes</i> ' should be moved to the RBP section.	This point has been moved to the RBP section.

Section 8. Health.

Pt	Pp	Submitter	Submission	NAWAC Response
8.1	29	206	Signs of Ill Health MS11, Intro: 2 nd line should read '... to maintain their dogs in a healthy condition'.	This has been reworded
8.1	29	206	Signs of Ill Health MS11, Intro: 4 th bullet point needs to be clarified what is intended by the bleeding. 4 th and 5 th bullet point should be combined to account for both internal and external bleeding. 6 th point could be rewritten to 'straining to pass urine and faeces but without result'.	These 4 th and 5 th bullet points have been reworded to account for both internal and external bleeding. The 6 th bullet point has been left as it is.
8.1	29	206	Signs of Ill Health MS11 (a): Word 'immediate' should be changed to 'prompt'. (based on definition in the oxford dictionary..)	The word 'immediate' (although maybe not as strictly accurate in terms of the oxford dictionary definition) gives more emphasis on the urgency of seeking veterinary attention and so it is preferable to use that word here.
8.1	29	24	Signs of Ill Health MS11 (a and b): Remove text in MS 11 relating to 'brought to the attention of an inspector under the act'. This could potentially be used to absolve the owner in court if they state that they have informed MAF or the SPCA.	The reference to 'brought to the attention of an inspector under the act' has been removed from the MS.
8.1	29	226	Signs of Ill Health MS11 (a and b): While the SPCA notes that the wording of this standard aligns with that in the Companion Cats Code of Welfare 2007, the SPCA is nevertheless concerned at the potential legal implication of including "an inspector	The reference to 'brought to the attention of an inspector under the act' has been removed from the MS.

under the Act" in both (a) and (b) and requests the opportunity to discuss this further with a representative of NAWAC.

8.1	29	65	Signs of Ill Health MS11 (a and b): Add 'animal control officers' to the list of people who can assess whether a dog should receive veterinary attention or be euthanized.	This part of the MS has been removed and the MS now reads 'if a dog is suffering... then the animal must be humanely euthanased'.
8.1	29	169	Signs of Ill Health MS11 (a) AND (b) : Add text 'must receive immediate veterinary attention, or be brought IMMEDIATELY to the attention of an inspector under the Act (e.g an SPCA inspector) or be humanely euthanased BY A VETERINARIAN.	Information has been included to say that the owner of the dog must seek immediate veterinary attention. It is considered that the MS should leave open the people who can euthanase a dog, if the pain is extreme, as immediate humane euthanasia is beneficial to the dog's welfare in this case (be it performed by a veterinarian or not).
8.1	29	86,89,92,101,106,107,113,117,121,131,133,176,180,181,184,217,	Signs of Ill Health MS11 (a and b): Finds both a) and b) appalling that a dog would be euthanased for these reasons.. Suggests adding the text only 'in extreme circumstances'	This MS has been reworded.
8.1	29	111,138,154,175,180,181,183,184,217,	Signs of Ill Health MS11 (a and b): These points appear to be repeated in a and b.	This MS has been reworded.
8.1	29	106,107,113	Signs of Ill Health MS11 (a) : Delete this MS (a).	This MS has been reworded.
8.1	29	? and 170	Signs of Ill Health MS11 (a ii): This is too specific for a minimum standard. It is not relevant to just identify one symptom of ill health in an MS.	This MS has been reworded.
8.1	29	169	Signs of Ill Health MS11 (a)(i) : Delete word 'significant'.	The word 'significant' has been left in the MS as, under some circumstances, dogs can be in pain but not require veterinary treatment (e.g stepping on a thorn or similar). As this is an MS and is therefore enforceable, it is considered that the word significant should remain here.

8.1	29	212	Signs of Ill Health MS11 (a and b): Many farmers live remotely and do not have easy access to a veterinarian or animal inspector and to have only euthanasia as the solution in these situations is unacceptable. To address this we believe that an additional category of farmer assessment and care eg expert care is required for such situations.	Information has been included to say that the owner of the dog must seek immediate veterinary attention. It is considered that the MS should leave open the people who can euthanase a dog, if the pain is extreme, as immediate humane euthanasia is beneficial to the dog's welfare in this case (be it performed by a veterinarian or not).
8.2	30	183	Diseases Related to Diet, RBP (b): This may need to be reworded as it reads a little as if any skin disease, vomiting or diarrhoea is a sign of food sensitivity.	This RBP has been reworded to clarify.
8.2	30	154, 183,206,	Diseases Related to Diet, RBP (c): Suggest that changes in appetite should be excessive or unexpected before veterinary attention should be sought as appetite can fluctuate due to hormonal changes etc	This has been changed to 'extreme or unexpected changes in appetite'
8.2	30	132	Diseases Related to Diet, RBP (d): Remove text 'and at least once a year at a veterinary clinic'.	This is an RBP. It is advisable to check the dog's teeth annually to check for any developing problems.
8.2	30	206	Diseases Related to Diet (d): add to the end 'to assure the continued good oral health of the dog.' – so that it is not seen as a mandate for veterinarians	This text has been added.
8.3.1	31	209	Prevention of Contagious Disease, MS: Suggest addition of MS stating that ' Dogs infected with a contagious disease should be carefully supervised or securely contained so as to prevent physical contact with other dogs and people'.	An MS has been added with this information.

8.3.1	31	159	<p>Prevention of Contagious Disease, Vaccination: Believes that the benefits of vaccination have not been proven to the degree where it is possible to legislate people to vaccinate their animals.</p>	Vaccination is not stated as an MS and so owners cannot be enforced to vaccinate however, it is advisable to vaccinate. The benefits of doing so far outweigh the potential harms.
8.3.1	31	80	<p>Prevention of Contagious Disease, Vaccination: This clause enforces upon certain breeds and/or bloodlines where animals are severely sensitive to and often react violently to vaccines resulting in permanent disability or death. NZ veterinary practices and recommendations of vaccine doses often differ from those of other countries (including England and the USA). Vaccination should be an educated choice.</p>	Vaccination is not stated as an MS and so owners cannot be enforced to vaccinate however, it is advisable to vaccinate. The benefits of doing so far outweigh the potential harms.
8.3.1	31	123	<p>Prevention of Contagious Disease, Vaccination, RBP (b): Vaccinations should not begin before 9 weeks of age to give the puppies immune system to strengthen. Multiple vaccinations at one time can cause long term damage of a pups immune system. A series of 2 vaccinations is all that is required.</p>	NAWAC disagrees. It is ok to give vaccinations earlier than 9 weeks. The vaccines are dead when the pups receive them and so the immune system is not challenged unduly.
8.3.1	31	206	<p>Prevention of Contagious Disease Intro: 4th line: Replace 'they' with 'can'.</p>	The word 'they' has been replaced with 'can'.
8.3.1	31	101	<p>Prevention of Contagious Disease, Vaccination, RBP (b): Puppies should not be vaccinated before 8 weeks of age as maternal antibodies will negate the vaccine. To give a vaccination prior to this time will do nothing more than injure the puppy's immune system and delay the timing of the first highly effective vaccine. The second vaccination is at 12 weeks, the third at 16 weeks and a booster at 16 months.</p>	NAWAC disagrees. It is ok to give vaccinations earlier than 8 weeks. The vaccines are dead when the pups receive them and so the immune system is not challenged unduly.

8.3.1	31	180	Prevention of Contagious Disease, Vaccination, RBP (b): These days vaccination protocols vary from vet to vet and there are no hard and fast rules.	Information has been included stating that a veterinarian should be contacted when the pup is 6 to 8 weeks of age to get advice on an immunization program.
8.3.1	31	23,154, 183,199,206,212,226,	Prevention of Contagious Disease, Vaccination RBP (c): Change 'should be restricted to areas to which potentially unvaccinated dogs have access' Change to 'restricted FROM areas to which potentially'...	This has been changed.
8.3.1	31	101,123,181,	Prevention of Contagious Disease, Vaccination, GI: Yearly vaccination doesn't increase the welfare of the dog, in fact it may compromise it. Given research is indicating that the autoimmune system will have been activated for life by the correct course of vaccinations as a puppy and does not require boosting, even at a perceived high risk situation such as a boarding kennels. The outdated notion of annual vaccinations should be expunged.	This section contains a recommendation for assessment for vaccinations, to reflect current understanding about the most desirable frequency of vaccinations.
8.3.1	31	29	Prevention of Contagious Disease, Vaccination, GI: Vaccinations have improved to the point where biannual vaccinations are sufficient to protect the dog. Choice should be left to the owner whether vaccinations are given annually or biannually.	This section contains a recommendation for assessment for vaccinations, to reflect current understanding about the most desirable frequency of vaccinations.
8.4	31	211	Parasitic Disease, Intro: Suggest 'Canine parasites may cause minimal disturbance to the dog, but a high parasite load may compromise welfare. Ill health may lead to an increase in parasite numbers and some environmental conditions result in large parasite populations that may cause disease and death. Individual dogs may develop hypersensitivity to parasites and show extreme irritation with very low parasite numbers. Some canine parasites are a public health risk.'	Text reflecting this information is in the introduction to this section.

8.4	32	80	<p>Parasitic Disease, RBP (a to c) : The recommended frequency of treatment is indiscriminate and too severe and unnecessary in many situations. While some bitches and environments allow large quantities of parasites, some allow little or none. The frequency of treatment may cause adverse effects and unnecessary harm to bitch and puppies. The frequencies recommended may be commercially inspired and driven. Breeder licensing including education would allow for informed management by breeders.</p>	Text added to reflect that advice of veterinarian or product manufacturer can be sought.
8.4	32	183	<p>Parasitic Disease RBP (c): This RBP should include some proviso for faecal testing for parasites and worming if there is a need.</p>	It is less expensive (and more usual) to just worm the dog but there is nothing in the CoW to prevent the owner obtaining veterinary tests for parasites if they should so wish.
8.4	32	48	<p>Parasitic Disease, RBP (d): Remove this statement relating to tethering or placing dogs on bare earth for permanent housing. Tethering on bare earth should be done for short periods only, not for tethering to a kennel as housing becomes damp and harbours disease and parasites.</p>	The RBP states that the 'site' should be well maintained and moved regularly to prevent the build up of hookworms.
8.6	33	206,211,	<p>Diseases Transmissible to Humans: Add to the introduction a sentence 'A disease transmissible to humans is called a zoonotic disease'. Or include in glossary.</p>	This information is contained in this section.
8.7	33	6	<p>Care of Claws and Coat MS12 (a): Remove words 'matting or' from MS on the basis that some dogs have naturally matted coats.</p>	NAWAC disagrees. Some dogs have naturally thick and coarse coats, but matting implies that the coat is tangled and unkempt. Matting of the coat is not natural.

8.7	33	206	Care of Claws and Coat MS12 (b): Rewrite 'Claws must be clipped when necessary to avoid penetration of the skin and/or foot pads'	This MS has been changed as suggested.
8.7	34	6	Care of Claws and Coat, GI. After the words 'interference with movement and..' remove the words 'vision, and'.... This is on basis that hair over the eyes protects the dog's eyes (in rough terrain while hunting etc) in some breeds.	NAWAC disagrees. The dog should be able to see where it is going and the hair should not be allowed to get so long that it can't do this. The dog cannot be used for hunting if it can't see.
8.7	34	29	Care of Claws and Coat, GI. Experienced breeders/owners can also provide advice and assistance on trimming claws.	Information stating that experienced breeders can provide assistance with trimming claws has been added.
8.8	34	6,101,155,170,180,181,	Exercise MS13: Suggests adding an MS stating that 'Dogs must not be exercised by running adjacent to vehicles'. Considers that this information is important and should be an MS, not just in the general information section.	This information has been removed as dogs are required to run besides farming vehicles when working. The risks also vary depending on the type of vehicle used (car, tractor, bicycle etc). It is therefore not possible to legislate this aspect.
8.8	34	23,138,170,	Exercise, RBP (b): It should be recommended that councils recognize the '60 minutes of exercise per day' clause and that it is not always possible to walk dogs in off leash areas and in some cases the use of vehicles to reach 'off leash' areas is not possible. Provision of more 'off leash' areas by council? This section should be reworded to reflect current legislation in regards to exercising dogs off lead.	This has now been placed as general information. It is recognized that it may not be possible to give every dog 60 minutes exercise per day in all circumstances. The 60 minutes can be used as a guideline for owners to plan the exercise for their dog.
8.8	34	24, 65,209	Exercise, RBP (b): Consideration should be given to the fact that some dogs are kenneled in large facilities (such as animal welfare shelters) with 60/70 dogs. It is not always possible to give each dog 60 minutes exercise in these facilities, and an inclusion of a statement that recognizes that facilities such as this may not be able to achieve the	This has now been placed as general information. It is recognized that it may not be possible to give every dog 60 minutes exercise per day in all circumstances. The 60 minutes can be used as a guideline for owners to plan the exercise (including self-exercise) for their dog.

exercise guideline of 60 minutes, should be considered. Consideration should also be given to the ability of the dog to self-exercise in their enclosures in this set-up.

8.8	34	156	Exercise, RBP b): 60 minutes of free exercise in greyhounds would lead to a potassium deficiency and associated muscle problems. Greyhounds exercise and dietary regimes must be strictly controlled for their own welfare.	This has now been placed as general information. It is recognized that it may not be possible to give every dog 60 minutes exercise per day in all circumstances.
8.8	34	89,92,106,107,113,121,131,133,147,165,171,176	Exercise, RBP b): Delete 'with freedom to explore their immediate environment'. Perceives that this encourages irresponsibility of people allowing dogs to roam out of the control of the owner.	Information has been added to this RBP to accentuate the fact that the dog must be under control at all times.
8.8	34	180	Exercise, RBP b): Add words 'in an appropriately fenced area.'	The words 'in an appropriately enclosed area' have been added.
8.8	34	121,150	Exercise, RBP c): Change '19 months' to '18 months' which is the accepted international age for training agility	This has been changed from 19 months to 18 months.
8.8	34	161	Exercise, RBP: Dogs should be given the opportunity to socialize with other dogs on a daily basis if possible.	This has been added as an RBP (f).
8.9	35	212	Harmful Substances, MS14 (a and b): Both parts a and b place a standard on the dog owner to enforce the separation of dogs and harmful substances whether by (a) physical means or (b) by dog control. Fed farmers state that dogs can still trespass on land where poison has been laid or still reach poisons even if kept out of reach. They wish this to be rewritten to 'owners must take steps to ensure that the risk to dogs from poisons and	MS (a) has been reworded to reflect that the owner must ensure that the risk is as low as is reasonably practical.

harmful substances is as low as reasonably practical under prevailing circumstances’.

8.9	36	23	Harmful Substances, GI: Suggests that the effects of 1080 do not need to be discussed – the text can simply be changed to ‘dogs must be kept under strict control when in areas where they could have access to poisons and harmful substances’	It is useful to outline the effects of 1080 so that they can be instantly recognized and veterinary attention sought ASAP. It has been recommended that dogs entering areas where 1080 has been dropped should wear muzzles.
8.9	36	214	Harmful Substances, MS14, GI: Suggest adding toxic algal bloom in the GI section and references to Didymo ‘safe practices’.	Covered by minimum standard. Didymo material outside the scope of a code of welfare.
8.9	36	6	Harmful Substances, GI: Suggests that the first sentence of GI ‘Further advice...0800 POISON’ should be repositioned to end of this paragraph	This sentence has now been positioned at the end of this paragraph.
8.9	36	6	Harmful Substances, GI: Reword second paragraph of GI to ‘1080 poisoning is fast acting and fatal to all dogs, it is 4 times more deadly to dogs than possums. 1080 can remain in an active form for 5 months or more in the carcasses of rabbits and possums which have been mummified or frozen...’	The detail included in this section is considered suitable. It is not necessary to add the potency of 1080 in different species or the half life of this poison.
8.9	36	6,180	Harmful Substances, GI: Remove sentence ‘1080-poisoned dogs can recover if they receive appropriate veterinary treatment’ on the basis that this is not true (or such a long shot that it is not true).	This sentence has been removed.
8.9	36	68	Harmful Substances, GI: Suggests that the government ban the use of 1080! However understands that this is not a realistic situation and so recommends that this section is reworded to emphasize the urgency in getting the dog to the vet	Text added to reflect fact that dogs can recover if treatment is sought immediately.

to receive treatment immediately – only then is it truly treatable.

8.9	38	23	Harmful Substances, GI: Owners are not always aware of 1080 poison being laid where signs have not been erected. Recommend to council that poisons not be laid in areas frequented by dogs?	This is outside the objectives of this CoW.
8.10	36	23,29, 80, 86,110,116,132,135,156,199, 205,216,	Care of Older dogs, RBP (a): Disagrees with statement that every dog over age of 7 years should have veterinary examination every 6 months. Recommends that this be changed to checks being performed when required. The clause does not allow experienced owners to manage their animal's welfare.	This has been changed to 'the dog should receive regular veterinary checks'.
8.10	36	86,89,92,106,107,113,121,123,131,133,163,171,184,	Care of Older dogs, GI: Disagrees with feeding of propriety foods/ commercial food being promoted as the only way to feed a dog. Owners are able to make the choice of the diet that best suits their dog. Text should be changed to 'The dog should be fed a diet that meets its nutritional needs'.	This text has been changed to state that 'the dog should receive regular veterinary checks to ensure that its health and welfare is maintained'.
8.11	37	24	Injured Dogs, MS15: Remove text in MS 15 relating to 'brought to the attention of an inspector under the act'. This could potentially be used to absolve the owner in court if they state that they have informed MAF or the SPCA.	The reference to 'brought to the attention of an inspector under the act' has been removed from the MS.
8.11	37	226	Injured Dogs, MS 15: While the SPCA notes that the wording of this standard aligns with that in the Companion Cats Code of Welfare 2007, the SPCA is nevertheless concerned at the potential legal implication of including "an inspector under the Act"	The reference to 'brought to the attention of an inspector under the act' has been removed from the MS.

and requests the opportunity to discuss this further with a representative of NAWAC.

8.11	37	86,89,92,106,107,113,121,131,133,176,184,217,	Injured Dogs, MS 15: The clause should read 'in extreme circumstances' should a dog be euthanased``.	The MS now reads 'if the pain/distress is untreatable, then the animal should be humanely euthanased'.
8.11	37	212	Injured Dogs, MS 15: Define 'significantly injured, urgent and attention'. This may be less possible in remote regions. Reword this or include within the MS that 'expert care' can be provided by the farmer.	The MS now reads 'owners of dogs which are seriously injured must seek urgent veterinary treatment. If the pain/distress is untreatable, then the animal should be humanely euthanased'.
8.11	37	226	Injured Dogs: While the statement under the heading "Dogs Injured by Motor Vehicles" may be a correct observation, it appears meaningless on its own as written. The SPCA advocates that the wording in the Companion Cats Code of Welfare 2007 should apply and hence the sentence reworded to read "Accidental injury to dogs while they are crossing roads is common and there is a recognised moral obligation on the driver of a vehicle who injures any animal, including a dog, to stop and render assistance".	This information has been added to this section.
8.11	37	211	Injured Dogs: An injured dog may be in severe pain and may bite during attempts to assist it. A muzzle will prevent biting.	This information has been added to this section.
8.12.1	38	22,	Surgical Procedures, Debarking: Supports the practice of debarking being continued. States that debarking takes the voice of the dog away but it can still make some noise, enabling the dog to still communicate. Owners can therefore continue to keep their dogs without the dogs giving their owners headaches and annoying the neighbours.	NAWAC disagrees with the fact that dogs should be debarked for convenience. Only if there is a risk that the dog will need to be euthanased due to excessive barking should surgical debarking be considered.

8.12.1	38	115	Surgical Procedures, Debarking: Opposes procedure of debarking being performed. It is of no interest to the dog to have its larynx removed and this should be banned.	NAWAC states that the procedure should be in the best interests of the animal i.e only if there is a risk that the dog will need to be euthanased due to excessive barking should surgical debarking be considered.
8.12.1	38	183	Surgical Procedures, Debarking: Define the term 'animal behaviour specialist'.	The term 'dog behaviourist' has been defined in the glossary.
8.12.2	38	31, 112,180,	Surgical Procedures, Removal of Dew Claws: Wishes removal of this section from COW – no further comments.	Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.
8.12.2	38	6,60,94	Surgical Procedures, Removal of Dew Claws: Has concerns with the fact that tail docking is being banned, but yet the code is allowing removal of dew claws.	Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.
8.12.2	38	68,80,94,116,129,135,141,146,147,170,180,189,205,209,213,	Surgical Procedures, Removal of Dew Claws: Ripped dew claws in older dogs can cause pain to the dog – therefore prefers to see dew claws removed at an early age when pain threshold for a puppy is minimal. Opposes proposal and seeks its removal	Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.
8.12.2	38	93,115,116,181,	Surgical Procedures, Removal of Dew Claws MS16: Dew claws should be removed when puppies are under 4 days of age.	Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.
8.12.2	38	48,169,	Surgical Procedures, Removal of Dew Claws, MS16: Suggests changing the wording of MS to 'Dew claws of dogs must only be removed by a veterinarian' – considers removal of dew claws should be a routine procedure performed in all dogs and should be performed by a vet irrespective of the age of the dog.	Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.

8.12.2	38	80,112	<p>Surgical Procedures, Removal of Dew Claws, RBP: Experienced breeders may be more efficient and cause less stress to the puppy than removal of the claws by a veterinarian. The RBP is therefore incorrect. Therefore RPB a and b should include 'experienced breeder'.</p>	Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.
8.12.2	38	29,116,	<p>Surgical Procedures, Removal of Dew Claws MS 16: Many experienced breeders are capable of removing dew claws if dog is <4 days of age. If over 4 days then the procedure should be performed by a veterinarian.</p>	Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.
8.12.2	38	116	<p>Surgical Procedures, Removal of Dew Claws MS 16: Moving pups to the vets at this age is probably the worst thing you can do. 2 day old pups should not be taken to the veterinary surgery unless it is an emergency. It puts the life of the whole litter at risk and risks the bitches 'future litters' by unsettling her at this time. Taking a small 'fading' pup to a veterinarian at this age could also cause more distress to a pup that is already struggling to survive. (Has outlined the process of home removal of the dew claws while ensuring the welfare of both pups and dam in the submission 116)</p>	Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.
8.12.2	38	129, 163,213,	<p>Surgical Procedures, Removal of Dew Claws MS 16: The decision whether to remove the dew claws or not should be made by the owner</p>	Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.
8.12.2	38	85,116,	<p>Surgical Procedures, Removal of Dew Claws, RBP: Contradictions between MS and RBP in terms of the under/over 4 days and dew claws being removed by a vet or not.</p>	Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.

8.12.2	38	226	<p>Surgical Procedures, Removal of Dew Claws, RBP: The SPCA suggests that Recommended Best Practice (b) be reworded to read “If any dew claw is to be removed from a pup aged four days or less, the ...”.</p>	<p>Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.</p>
8.12.2	39	6	<p>Surgical Procedures, Removal of Dew Claws, GI: Delete second paragraph in the GI section on the basis that law suits have been filed in the US against vets that have removed dew claws without permission during neutering of the clients dog.</p>	<p>This issue is related to veterinarians acting according to their code of professional conduct and should be managed accordingly, rather than in a code of welfare. The text in the code remains relevant for best animal welfare practices.</p>
8.12.2	39	101,111,	<p>Surgical Procedures, Removal of Dew Claws, GI: The removal of dew claws is painless when performed at a few days of age, but waiting until the dog is neutered, which may be carried out when the dog is an adult, is wrong. The dam will cleanse the site if performed as a puppy, but as an adult the removal of the claws would invite infection and pain in the dog. This clause should be removed.</p>	<p>This can be left to veterinary discretion and dealt with between the veterinarian and their client.</p>
8.12.2	39	116	<p>Surgical Procedures, Removal of Dew Claws: Removal of dew claws actually causes more discomfort to the pup than docking as it must be performed with scissors.</p>	<p>Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.</p>
8.12.2	39	117	<p>Surgical Procedures, Removal of Dew Claws: The hind dew claws are more susceptible to injury than the front claws.</p>	<p>Noted.</p>
8.12.2	39	205	<p>Surgical Procedures, Removal of Dew Claws: Pain relief should be used when performing this process.</p>	<p>Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.</p>

8.12.2	39	212	Surgical Procedures, Removal of Dew Claws: Problematic for remote farmer to have a veterinarian to perform this. May be better to recommend that a veterinarian must only provide oversight in these cases.	Noted. Dew claw removal and dog tail docking sections amended to address need to minimise welfare costs. This issue is addressed in the code report in detail.
8.12.2	39	227	Surgical Procedures, Removal of Dew Claws: Some breeds of dog have dew claws (some double ones) left intact as part of their breed standard.	Noted. The code contains a new minimum standard requiring appropriate care to be taken where dew claw removal is <i>not</i> performed.

Section 8.12.3. Tail Docking. [Note that NAWAC responses are not listed for each submission in this section. The code has been amended and the code report provides detail.]

Comments relating to the inclusion of this section (i.e banning tail docking)

1,5,7,20,150,161 Support banning tail docking – no reasons given.
,199 ,

Comments in relation to physiology/behaviour etc

27,35,52,56,58,1 Removal of the tail during docking/banding causes pain
21,131,211,
211,227,
Removal of a functioning part of a living creature causes pain and is not acceptable. Puppies' tails are docked at around 2-5 days of age and advocates of tail docking claim that it does not cause pain or discomfort, as the nervous system of puppies is not fully developed. This is not the case. In articles published in medical and veterinary literature over the last 25 years, there remains no doubt that neonatal animals, including puppies, are capable of feeling pain. In fact, due to differences in physiology, they may even experience a greater degree of pain than an adult subjected to the same procedure. Docking a puppy's tail involves cutting through muscles, tendons and up to seven pairs of highly sensitive nerves, and severing bone and cartilage connections. Puppies give repeated intense shrieking vocalisations the moment the tail is cut off and during stitching of the wound, indicating that they experience substantial pain. All available evidence this far is consistent with the claim that docking causes acute pain – no evidence is available saying that this process does not cause pain. (See submission 211 for comprehensive arguments in relation to this point)

56,58 Removal of a functioning part of a living creature causes stress

- 52,211, Removal of the tail causes chronic (long term) pain in some circumstances (see submission 211 for further details).
- 211 Removal of the tail can affect other aspects of the dogs' health including atrophy of tail and pelvic muscles, risk of incontinence and perineal hernia and formation of neuromas. The incidence of these side effects is unknown but it is against welfare interests to lay dogs open to an unnecessary procedure.
- 52, Removal of the tail can cause an increased sensitivity to pain in later life
- 21,227, Tails are required for balance
The tail forms an important function as a counter balance when a dog is moving at high speed, turning sharply, balancing on a narrow ledge, jumping or climbing. It is logical to assume, (and has been stated by veterinary professionals dealing with dogs participating in competitive sports), that a dog deprived of this counter balance will find greater difficulty in performing these actions accurately.
- 21,27,56,211, Tails are required for communication and normal social behaviour
227, Dogs communicating with one another or interacting with people make use primarily of body language, a complex set of signals encompassing everything from the orientation of the dogs' bodies relative to one another, to the extent to which the eyes are widened. One of the highly visible aspects of canine body language involves the carriage and the movement of the tail. Dogs without tails and those with are likely to find efficient communication difficult, which can affect the way they behave towards one another, e.g. through increased aggression. The tail surface also contains scent glands about one third down the length often where docking takes places (supra caudal scent glands) which assist with communication.
- 52,227 Studies indicate that removal of the tail in an immature puppy may lead to improper development of the rectal and anal muscles, leading to an increased risk of faecal and urinary incontinence.
- 56,58,227, Badly executed docking can require painful corrective surgery, the onset of problems due to infection or may even cause the death of a puppy
- 193 When seeing docked dogs in the company of those with tails it is obvious that the docked dogs are disadvantaged
- 211, 227 Tail docking cannot be justified by purposes of hygiene
Docking for hygiene around the tail: It is claimed that some heavy coated breeds need to have their tails docked for hygiene reasons, to prevent faecal contamination of the anal region and fly-strike. However, many undocked breeds e.g. Afghan Hounds, Bearded Collies,

Komondors, Pulis, Maltese, have similarly thick coats and regular care is all that is necessary to maintain good hygiene. There is nothing to suggest that the presence of a tail increases the problem. In fact a tail can act as a fly swat.

211 Tail docking for human convenience (e.g so the dog does not knock items off shelves at home etc) cannot be justified. A dog that is excitable and not particularly well trained may indeed cause problems in the home. But a child can also cause problems, and so docking for this purpose flies in the face of credibility. This can be solved by rearranging the furniture.

Comments in relation to tail injury

211, 227 Any legislation prohibiting mutilation should include the docking of dogs' tails except for truly therapeutic reasons

21,211,227 The claim that docking prevents tail damage in hunting/gundogs is not supported by independent evidence. Most working dogs have been docked making it impossible to validate the statement that it prevents tail injury.

211 There are studies available that indicate that the incidence of tail injury is very low. In fact vets receive more cats with tail injuries than dogs. There have never been suggestions that a cat's tail should be amputated at birth.

52,56,227 The occasional injury to a tail does not justify the docking of an entire breed. A small number of photographs/case studies of tail-injured dogs. It is interesting to note that the same 15 or so examples are used throughout the world by advocates of docking, and appear to originate with the UK CDB. They include non-UK examples of injury as well as tail injuries in non-gundog breeds and even in breeds that are not customarily docked, including one mongrel. One Spaniel in particular that is mentioned regularly in campaigns was photographed over a decade ago and the owner states 'Matty worked alongside many other dogs, not just mine, and no others had damage similar to hers.' This tends to suggest that the CDB has been unable to find many documented examples of injury in gundogs, even in those countries which have had a complete ban on docking for a number of years. One photograph appears to be that of an injury to an already docked tail. Tail stumps are more likely to suffer damage due to thin skin coverage as a result of docking. The ADA does not dispute that tail injuries will occur, as do injuries in paws, ears, muzzles, etc., and endorses genuinely therapeutic tail-docking to address serious injury or disease. However, the CDB cases show that tail injuries can occur in any breed, customarily docked or not, working gundog or not. The logical conclusion to their approach is that all puppies of all breeds should be docked soon after birth just in case a later tail injury occurs. Although tails can be difficult to heal, they are not necessarily more so than chronic injuries in other parts of the body, such as paws.

56,227, Although this procedure may be advantageous to working dogs in some circumstances, most dogs today are pets and do not work.

227 Although most dogs do not work these days, docking is still being performed at the instigation of breeders.

- 193 This submission is against tail docking in general but would support it for those dogs genuinely requiring the process to prevent tail damage in hunting etc.
- 52,168,227, Performance of tail docking should be restricted to operations that are genuinely necessary to improve the welfare of the individual dog.
- 21,56,193, If dogs it were beneficial/natural for dogs to not have tails then they would have been born without one.
- 52, Inconvenience and needs of householders or exporters (e.g tail knocking items off shelves etc) are not a valid reason to perform this process and cause pain.
- 193 There are benefits of tails as 1. a dog has protection to the area from flies, 2. it has complete balance, 3 it can point. Some breeds have learned to live without tails and some cannot do without them.
- 227 The German Pointer is docked (on the basis for potential tail injury) whereas its English counterpart is not. The submission outlines a report into tail injury in undocked German Shorthaired Pointers in Sweden after the banning of docking in 1988. This was a survey by the breed society, which unsurprisingly opposed a ban. The study was a 2-year study but in the second year reports were received on only half the original 50 litters surveyed; these appear to have been self-selecting (and the injury totals were mathematically compounded in the second year). Some of the Pointers were used for sledding, rather than as gundogs. The study claimed to show a high proportion of tail injuries, and 7 of 299 dogs born in 1989 had injuries serious enough to require amputation¹. In 1996, the Swedish Board of Agriculture reviewed the study at the request of the breed society and rejected it as unscientific; no other study indicating injury is quoted anywhere. However, Norway banned all tail-docking in 1987, and a Norwegian contributor to the CDB website states, apparently in 2002: "... I am very much involved with the spaniel club, and know that it [tail-injury] has not been a big problem".
- 227 This submission includes case studies of tail injury which they state may be unfounded.
- 211 There is no evidence supporting any benefit associated with this procedure, but there is ample evidence of a welfare cost to the animals concerned. There is no net benefit – and it is therefore not ethical.
- 226 Alleged Damage to Dogs' Tails
- All dog breeds that are currently docked have natural tails similar to other undocked breeds. There is no evidence whatsoever that these dogs would suffer any disadvantage by keeping their tails.
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Claims such as tail damage, and health issues due to cleanliness or spinal damage are completely insupportable inasmuch as these breeds would suffer no higher incidence of these injuries than other breeds.

It is worth noting that veterinarians report that cats are far more susceptible to their tails being damaged, yet no one has suggested that it would be a good idea to routinely dock all kittens on the basis that their tails may be damaged later in life.

Comments in relation to the docking/banding process

- 227 Docking (and the removal of dew claws where deemed a welfare issue) should only be permitted to be performed by a registered Veterinary Surgeon using local anaesthetic.
- 227 At the time that the docking takes place, rarely could the future lifestyle of the dog be predicted with any certainty.
- 122 Tails should never be docked without pain relief
- 211 Haemorrhage and other complications can occur following docking of the tail

Comments in relation to the breed standards

- 56,227 Docking is not necessary to maintain the physical quality or standards of the breed. In addition, most dogs bred for showing already end up as pets because they do not meet the required standard in one way or another. Tail carriage is only as likely to affect suitability for showing as any other physical feature. In any event, variations in tail carriage could be allowed for in breed standards until it becomes clear which is preferred/is most common.
- 211 Just because something is traditional doesn't mean that it is beyond scrutiny. Many traditions have their origins in very different circumstances than today. In addition, the human-animal relationship was very different at the origin of tail docking. We now have a moral duty to minimize the harm to animals in our care. It is also true that many breeds are no longer used for the purposes for which they were originally docked.
- 227 Advocates of continued docking is that breeders have not been breeding for tail carriage, and that the different tail carriages which appear are somehow defects requiring docking to remove them. This is docking for entirely cosmetic purposes.

- 27,227 It is claimed by those advocating continued docking that “the public” do not want undocked dogs. ADA members’ experience is the opposite; those with undocked dogs from customarily docked breeds are often greeted by dog owners with docked dogs with phrases such as “I wish I’d been able to find one with a tail”. ADA listed breeders find good homes for their puppies with tails.
- 161 Breeders do not put the welfare of the dog as paramount to its proclivities.
- 226 Breed Standards
- International and New Zealand Kennel Club breed standards now allow for full tails on all breeds previously commonly docked, signalling their support for the demise of this unnecessary practice and recognising the inevitability of legislative intervention.
- A minority of breeders will be affected by retiring this practice, and those who are at present cosmetically altering their dogs would, within a few years, be obliged to sell and show undocked dogs to follow what is rapidly becoming the ‘fashion’ within the international breeding community.
- This bill will ensure that their dogs will, in the short rather than the long term, no longer have to suffer from this outdated practice.
- xx Many countries’ Kennel Clubs breed standards have changed to show standards for both docked and undocked specimens. As in England and Wales, docked dogs born after April 2007 cannot be shown at fee paying shows, the breed standards are to be amended to undocked dogs.² This change was also inevitable as the response to the increasing number of dogs of customarily docked breeds from countries in Europe where docking is banned being shown at British Shows as a result of the relaxation of quarantine rules.
- There are about 200 breeds of dog in the UK and most countries currently eligible for registration by the respective Kennel Clubs. Of these, approximately 60 of these have been customarily docked; this continues to be stated in the breed standard although the standard has been amended in the past few years to incorporate a standard for an undocked tail (list of breeds is attached in the submission)
- 227 An examination of the original purposes for docking (included in submission 227) - which might at one time have been thought to justify tail-docking - indicates that they are no longer relevant to most dogs bred in the UK and elsewhere; for example, rodent control (Yorkshire Terrier), badger and otter hunting (Welsh Terrier, Airedale Terrier), and sheep and cattle herding (Old English Sheepdog, Welsh Corgi); yet the vast majority of dogs from these breeds continue to be docked. Where the original purpose might still apply to a small proportion of dogs bred in the UK and elsewhere, such as some of the gundogs, there is little consistency between which dogs are docked and which are not, as well as to the length to which the tail is docked.
1. Anomalies include:
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- In the Gundog Group, German Shorthaired and Wirehaired Pointers are customarily docked to about half natural tail length, but only the tip is removed from the tail of the much longer-haired German Longhaired Pointer, and English Pointers are not docked at all. Long-haired Weimaraners used to be tip docked but rarely if ever done nowadays.
- English and Welsh Springer Spaniels are docked, but English Setters, of a similar size and build, are not (Spaniels are distant cousins of Setters); nor are Labradors or other Retrievers. The King Charles and Cavalier King Charles Spaniels are listed as docked breeds but are rarely docked nowadays.
- Foxhounds (along with every other member of the Hound Group) are never docked, even though they might be expected to be working in very rough terrain, out of close control.
- In the Working Group, Boxers, Rottweilers and Dobermanns are customarily docked but Dogues de Bordeaux, Mastiffs (excl. Neapolitan) and Beaucerons are not.
- Among Terriers, Australian and Fox (both Smooth and Wire) Terriers are traditionally docked, but Bedlington, Cairn and Manchester Terriers are not.
- In the Pastoral Group, Old English Sheepdogs, Australian Shepherd Dogs and Welsh (Pembroke) Corgis are customarily docked, but Bearded Collies, Rough Collies and Welsh (Cardigan) Corgis are not.
- In the Toy Group, Yorkshire Terriers are customarily docked, but the equally hairy Maltese is not. West Highland and Bedlington Terriers are not docked. Border Terriers are no longer docked

211 Many of the dogs that come from breeds that are traditionally used in what are claimed to be high risk occupations for tail injury (mainly hunting) are not used for that purpose at all.

Comments relating to Legislation

227 Difficulties have been experienced in England and Wales following the legislation permitting certain exemptions. The law is being flouted as the regulations are loose and there are inadequate safeguards in place for its enforcement. If exemptions should be proposed then any system suggested will be complex to enforce with inevitable loopholes (see above); nor is permitting docking of all dogs in some breeds an acceptable or necessary alternative. This submission will seek to demonstrate that these, or indeed any, exceptions to a ban are

unnecessary. Instead, the ADA would suggest a 5-year moratorium on all but therapeutic tail-docking with an independent review at the end of that period. Further regulations could then introduce exceptions if this was scientifically demonstrated to be required³.

227 There are 22 countries around the world who have already instituted a complete ban on docking. A list is attached to the submission (227). The ADA urges the New Zealand government to follow the example of these other countries by banning tail-docking completely, initially by bringing in a 5-year moratorium on all but therapeutic tail-docking with an independent review at the end of that period; in other words, to state that in pre-regulatory assessment that any exceptions by way of regulation are unnecessary until such time as approved independent evidence can be assessed.

226 The SPCA applauds the inclusion of Minimum Standard No. 17. The following extract from the SPCA's submission of 25 February 2005 to the Government Administration Committee on the Animal Welfare (Restriction On Docking Of Dogs' Tails) Bill sets out the SPCA's arguments in support of the minimum standard in the draft code.

"The Royal New Zealand SPCA supports the restriction on docking of dogs' tails for other than medical or surgical reasons by veterinarians or veterinary science students for the following reasons.

1. Compliance with the Animal Welfare Act 1999

The Royal New Zealand SPCA believes that cosmetic amputation of dogs' tails is contrary to the intention of the Animal Welfare Act 1999 – that is, to prevent ill-treatment of animals.

- (i) 'Ill-treat' as defined in the Act (section 2, Interpretation) means 'causing the animal to suffer, by any act or omission, pain or distress that in its kind or degree, or in its object, or in the circumstances in which it is inflicted, is unreasonable or unnecessary'.

Tail docking is a totally unnecessary mutilation causing pain to the pup and the possibility of immediate to long-term complications such as infection, nerve damage and incontinence.

- (ii) The Act, in section 4 (Definition of 'physical, health, and behavioural needs'), includes '(c) Opportunity to display normal patterns of behaviour'.

Full tails, in this context, allow dogs to communicate their feelings to their owners and other dogs, and docked dogs are largely deprived of this mode of expression.

- (iii) Section 4 of the Act also specifies '(d) Physical handling in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress'.

³ Note: no country that has already banned docking completely has found it necessary to do this.

The New Zealand Veterinary Association cites acute pain in association with tail amputations indicated by squealing and struggling of pups, and suggests that indeed a higher level of pain may be experienced by pups than dogs as they possess less pain-blocking mechanisms than adult animals.

- 211 The NZCDB claims that the legislation is unworkable claiming 'no person has been successfully prosecuted for removing the dog's tail in a country that currently has a ban in place' Despite the relatively recent legislation to be introduced in Australia, the NZVA can cite cases of successful prosecutions in both NSW and Victoria, with more pending.
- 161 If approved by the committee, any subsequent proposed changes should be reviewed by the committee and only at periods of 5 years or more.
- 211 NZ is probably more reliant on the export of animal products than any other 'first world' trading nation. This country has a reputation of a country that looks after its animals – and maintenance requires a constant evolution of attitudes and practices. The number of countries that have banned tail docking is growing and we are looking conspicuous by our absence.
- 211 The NZVA has never received one complaint (in 14 years) from any other vets in regard to their policy on tail docking, and profession wide reviews are carried out every 5 years.
- 226 International Legislation and Regulation
- Imposing this restriction would be in line with international animal welfare legislation. Nine countries (including Australia, Germany, Switzerland, Sweden, Norway and Iceland) have banned tail docking of dogs for other than medical or surgical reasons. The United Kingdom has included a ban on canine tail docking in their Animal Welfare Act which is to be considered this year, as mentioned in the Queen's Speech to their Parliament.

Comments relating to social considerations

- 211 Although NZ values 'freedom of choice' , this freedom should not impinge negatively on the welfare of animals or for the environment.
- 52,193 Treating a dog as an 'object to be cut and shaped' is not acceptable - also sets a bad example to children who may develop less empathy towards animals as a result
- 52 Link between animal abuse and anti-social behaviour is a concern when docking tails.

- 52 Animals should not be made to suffer for convenience or economic gain.
- 168 New Zealand should follow other developed countries and ban tail docking for aesthetic reasons.
- 168,211 Some breeders are tail docking their dogs against the requests of the agreed owner who wishes the dog not to be docked.
- 199 In particular supports the prohibition of tail docking as it has become more necessary by dogs and well grown pups being imported from Australia and other countries with full tails and then being docked in NZ. Many show catalogues have revealed many dogs imported from Australia, which are too young to have their tails legally docked in Australia, but are being shown in NZ with docked tails.
- 227 The practice of tail-docking has continued virtually unchecked, with the assistance of the Council of Docked Breeds (CDB), an organisation that campaigns for the retention of docking at will and arranges referrals to vets who will dock.
- 228 Dianne Yates private members bill was part of the original Animal Welfare Act 1999, but was dropped because of lobbying of a minority of dog owners. But international trends and research indicate that it is a less popular, painful, cruel and unnecessary practice. It has no health or welfare benefits for dogs and is mere fashion of owners with some breeds.
- 226 Public Opinion
- In a poll conducted by Colmar Brunton in February 2005 (see attached report) [available on request] on behalf of the Royal New Zealand SPCA, the majority of New Zealanders surveyed opposed tail docking. When asked whether they agreed or disagreed with the SPCA's position that tail docking of dogs should be banned, 68% said they agreed, 18% said they disagreed and 14% had no opinion.
- The survey also asked whether respondents or their families currently owned or cared for a dog – 30% replied yes, 70% no. The results for each category were then as follows:
- Dog owners: 65% agreed with the SPCA's position that tail docking of dogs should be banned, 29% said they disagreed and 6% had no opinion.
 - Non-dog owners: 70% agreed with the SPCA's position that tail docking of dogs should be banned, 13% said they disagreed and 17% had no opinion.
- The poll has a margin of error of +/- 4.4%.
- It is clear from the poll results that, across both dog owners and non-dog owners, there is strong support for the SPCA's position that tail docking of dogs should be banned.

226

The Royal New Zealand SPCA supports this bill as a timely amendment to the Animal Welfare Act 1999 in safeguarding the welfare and well-being of dogs that are commonly cosmetically mutilated by dog breeders.

Comments relating to the removal of this section (i.e continuing to allow tail docking)

15,17,31,88,92,1 Oppose banning tail docking – no reasons given.
10,116,126,134,
137,144,147,202

Comments relating to physiology/behaviour

3,6,8,9,13,23, Disagrees with concept of tail docking being painful (this category includes arguments re: nervous system – see above)
25,33,
36,37,40,48,5
1,58,59,60,61,
63,64,76,78,8
1,90,92,94,95,
96,105,106,10
7,109,112,113
,116,117,121,
121,123,124,1
25,131,135,13
6,138,141,145
,146,149,157,
160,162,164,1
74,180,184,19
6,208,210,213
,219,224,230,
231,233,235,
3,8,9,13,25,48 Disagrees with concept of tail docking being stressful/cruel
,51,58,60,63,6
4,81,92,95,10
5,112,121,131

,136,138,141,
145,152,174,1
80,181,224,23
1,233,234,235

4,48,85,105,1
10,xx

Disagrees with concept of docking causing 'emotional scarring' (i.e long term stress)

6,13,23,25,33,
36,37,

Disagrees with concept of tail docking having 'further impacts on health' (e.g infections or complications following docking or changes in temperament etc)

40,48,51,68,8
0,81,90,95,10
5,135,136,157
,160,162,172,
177,182,196,2
14,xx

Disagrees with concept that docking may affect the ability of the dog to communicate

3,6,23,25,29,3
3,48,51,58,62,
64,68,81,90,9
4,95,105,136,
162,172,180,1
96,197,201,21
4

208

One third of the tail remains and is easily visible to other dogs. It is also desirable to leave some tail as it is useful when the dog 'points' during hunting.

13,29,33,40,4
8,51,63,81,90,
94,105,136,16
7,174,196,

Disagrees with concept that docking may affect the dog's movement, coordination, swimming or balance.

33,40,48,136,
174,xx

Disagrees with concept that docking may cause incontinence and other related problems

76,90,93,180,
197,

Docking the tail prevents soiling of the anal area and is used to maintain hygiene around the tail of the dog..

196

Problems arising as a result of tail docking do occur, but are very rare.

Comments relating to tail injury

- 11,13,18,19,2
2,25,29,33,34,
36,37,38,40,4
3,45,46,47,48,
50,53,55,57,5
9,60,61,62,63,
64,66,68,70,7
2,73,74,75,76,
78,79,80,81,8
2,90,92,94,95,
97,98,99,100,
101,102,103,1
06,107,113,11
4,118,119,121
,127,128,129,
131,135,136,1
38,139,141,14
3,157,160,163
,167,170,171,
172,180,182,1
84,186,189,19
0,192,194,196
,197,201,205,
208,218,230,
127
- If the tail is not removed it can be injured later in life when the dog is used for hunting etc. The dog moves quickly through coarse undergrowth and the tail wags rapidly during this process and can often be caught in bush and be seriously injured. Terriers etc can be injured when chasing mammals down holes and their tails get broken as they try to turn around in the holes. Dogs that are not used for hunting can be injured in the domestic situation where they catch their tails in doors or on furniture etc. Removal of the tail as a pup prevents this. Tail injury can be problematic to treat and slow to heal in adulthood and often requires further amputation to treat adult tail injuries – causing the dog more pain than would docking as a puppy.
- 103,
- The tails of terriers are removed to reduce the chances of the tail dislodging the dirt while chasing a rat down a hole and the hole then collapsing in on the terrier.
- 80,93,101
- The large majority of dog breeds do not suffer because of retaining their full length tails (most breeds used as companion animals), but some breeds used for hunting (e.g pointers) do suffer greatly from tail injuries as a result of not docking their tails.
- Some breeds with undocked tails can cause injuries to people and other animals as well as themselves leading to banishment and social isolation – resulting in abandonment, stress and anti-social behaviour.

- 109 Some dogs have their tails docked to reduce the incidence of 'tail colds'. A tail cold (also called limber tail) is where a dog swims in cold water and the end of the tail becomes cold and numb, due to lack of blood circulation. This is painful and can take up to a week to resolve itself.
- 94 An increase in tail injuries in countries that have banned docking has been observed.
- 101, 102 The lifetime of constant pain that will have to be endured by dogs with broken tails cannot be compared with the no pain banding of a whelp's tail at the age of two or three days.
- 114 Damage to the tail as an adult causes pain as the tail is an extension of the spinal cord. A tail amputated later in life is thicker at the end than if it was docked at birth. If a dog gets used to having a tail and then has it amputated in adulthood, it will affect it more as the dog will have got used to the tail by the time it is an adult.
- 114 Some dogs that repeatedly have their tail injured during hunting have to be retired from hunting.
- 119 Submission states that the owner wouldn't want to own a dog that can't hunt day in day out without risk of injury.
- 125,139,141,146,164, Some breeds carry a natural bob tail gene, which can cause them to be born with tails that aren't straight – so states that this type of tail must be removed for the health of the dog.
- 188,201, Many of the docked breeds carry their long tails erect. If they were not docked then it can put too much strain on the spine which shortens their life by crippling them.
- 196 A number of naturally docked breeds exist which function perfectly well emotionally and interactively.
- 207 It should be recognized that not all breeds are the same and should not be treated as so (in terms of banning the docking of all dogs).
- xx Dogs have been bred selectively over many decades and in a sense may have 'man made faults, of which the tail is one. Native wild dogs do not have thin whippy tails as natural selection will have corrected this.

Comments relating to the docking process

- 4,8,14,23,28,29,36,37,38,39,48,59,60,61,6 Supports continuation of tail docking when performed within the first 2-4 days of life.

2,63,66,68,70,
74,76,78,81,9
2,97,98,99,10
3,105,106,107
,109,112,113,
114,116,121,1
25,126,127,12
8,129,131,135
,136,141,143,
145,146,149,1
57,160,162,16
4,171,172,185
,187,189,196,
208,210,213,2
17,219,224,23
0,233,235,236
,238

(others prior to
58),58,62,76,7

7,80,90,92,95,
99,105,106,10
7,109,112,113
,115,121,125,
131,138,141,1
42,145,152,16
4,180,181,188
,197,198,208,
217,219,224,2
31,235,236,23
8

73,94,95,99,1
01,105,106,10
7,113,115,121
,131,146,152,
180,181,197,1

The technique used to dock the dogs can determine the amount of pain etc experienced by the dog. These submissions state a preference for the banding method

Banding is not mentioned in the COW. Australian scientists now have under peer review evidence that tail banding does not cause distress or pain to the pups.

98,224,231,23 3,235,236,238 171,190,205	Supports use of local anesthetic when tail docking.
54,64,	Banning tail docking could cause an increase of this procedure being performed by untrained personnel (e.g at home etc).
34	Suggest that you could make the code applicable on a case by case basis – if there are good grounds for docking a particular breed, then add it to an approved list which is available to veterinarians, so that it can be performed where appropriate.
3,13,23,33,34, 38,39,48,54,5 6,62,63,64,74, 90,103,109,12 8,145,167,170 ,172,190,197, 198,210,217, 58,59,106,107 ,109,113,115, 121,131,136,1 74,189,196,21 9, 40,60,136,142 ,174,196,219, 217	Supports restriction of this procedure being performed by qualified people only (e.g veterinarians and/or development of a register of people certified to perform tail docking)
	Veterinary surgeons are not trained to dock tails
	Many breeders are able to dock tails themselves without any adverse effects
	Pups should not be docked when they are more than 4 days of age.
105,109,157,1 60,172,197,19 8, 73,94,95,189, 230,	Proposes that tail docking is performed by banding if the pup is under 3 days of age. If the pup is over 3 days of age, the process should be performed by a veterinarian.
	Any distress or protest in the pups is caused by the fact that the vet is inept, does not have the puppy on a warm towel, handles and cuddles it, turns the puppy upside down or does not have arrangements for the pup to be placed immediately on the mother. In many instances the tails require stitches which is not required if the tail is docked correctly.
196 (and others),210, 180	Puppies can continue to happily suck from their mother while their tails are being banded – and those that are removed are return immediately to the mother following the procedure to suckle and sleep Would very much support the addition of standards being included to perform the process of tail docking in the code – with consultation of affected parties.

196 Discussions contending that pups feel acute pain have had to rely on extrapolation from other species (esp. lambs).

Comments in relation to breed standards

94 Breeding dogs with shorter tails is not viable, there are far more important attributes in breeding choices (such as genetic health, structural soundness, ability and temperament).

58,90,101,124
,128,136,160,
177,210,
101

Wishes to maintain breeds as originally intended

Docked breeds have never had full tails and their anatomy has been 'built' without the consideration of a tail being present. Docking was part of the overall development of the breed and consideration has been given in this respect to its anatomy, physiology, movement and temperament.

92,99,100,106
,107,109,113,
121,131

Breed registrations and quality have dropped as a result of the tail docking ban

92,95,106,107
,109,113,121,
131,141, 157

Many breeders will leave dog breeding if this ban is introduced. (A survey of dog breeders showed that as many as 63% of breeders will change their breed or leave dog breeding altogether if a ban is enforced. Of those surveyed, 70% of breeders either docked their own puppies or had an experienced lay person do it for them. Vets only see 30% of the puppies for docking. Of the vets who do dock, only 9% use the banding method).

3,36,37,51,64,
90,92,106,107
,109,113,121,
131,194,

Considers that banning docking in some breeds could cause these breeds to become extinct

72,80,95,109,
138,
64,82

Non docked tails on usually docked breeds are considered 'a very serious fault' – will effect judging of breeds when being shown

Tail docking is traditional.

95 People prefer to buy dogs that have the 'original look' of the breed.

95,157,

The number of dog breeders will reduce overall if this ban is introduced and therefore the number of 'backyard breeders' will increase who breed without thought to the genetic history or temperament of the dog – goes against intent of the Animal Welfare Act.

- 96,230, Breeder has always provided written declaration that the dog will perform in the field in the manner what their hereditary background suggests. He would feel unfair if he could only provide a dog that would have its time in the field curbed as he has a damaged tail.
- 99,100,106,107,109,113,121,131,194,197,108 Undocked show dogs have had to retire as their tails have become sensitive after adult tail injury – not the case for adult dogs who were docked as puppies.
Changing breed standards would be time consuming.
- 109 Only NZKC members are allowed to have their dog tails docked
- 116,197, As specific breeds have been docked for a long time, the breeding of these dogs with tails will cause variability within the breed standard which will affect their ability to be shown.
- xx, Pedigree breeds are popular due to the fact that they are of a standard appearance. If tails were not docked, they would not conform to a 'standards in tails'. They would therefore lose their marketability.
- 180,181,197, No breed standard disqualifies an entire tail in a customarily docked breed.
- 188 Banning docking will bar breeders from exporting their best stock to keep the gene pools around the world healthy and varied. When exporting a puppy to another country it does mean that the breeder does have to dock the whole litter as it is impossible to choose which ones are best at 4 days of age.
- 196 The public interest in the recreational value of the dog outweighs any minor discomfort caused to animals by tail docking. And may enhance the dogs value in the light that tail shortening of a grown dog is expensive.

Comments in relation to social considerations

- 4, 14, 23, 28,33,34,38,40,43,44,46,47,49,50,53,55,57,58,59,61,62,66,70,71,74,76,77,78,79,82,85,86,92,96,97,98,99,100, Opposes 'blanket' ban on docking and the threat of 'losing their freedom of choice' and wishes some breeds/individual dogs to continue to be docked.

105,106,107,1 09,110,112,11 3,115,121,128 ,129,130,131, 133,134,137,1 41,143,145,14 6,152,163,166 ,172,174,181, 184,188,194,1 95, 196,197,201,2 10,213,218,21 9,230, 19	Unless it is made illegal to neuter cattle, then owners and vets should have the right to choose whether to dock the tails of dogs.
12,74,82	Noone should complain about tail docking in pets as circumcision of boys is legal.
6,192	Remove use of 'may or may not' within NAWAC comment for public consultation in this section. Effectively banning docking because it 'may or may not' have transient effects – maybe could use word 'speculative' instead.
102	Doesn't want an increase in vet bills due to tail injuries due to the inclusion of this clause.
106,107,109,1 13,194, 106,107,113	The cost of treatment of injuries to tails may be prohibitive for some people leading to the dog being in pain or euthanased. Banning tail docking will affect the lives of a large number of people.
xx	Objects the role that the NZVA has played in the proposal for tail docking as they have much to gain financially if it does come into force.
234	Disagrees with idea that tail docking is cruel as it would not make sense for breeders to dock if it risked the lives of their puppies each time. Breeders put much time and energy into breeding the 'perfect specimen' and would not risk their pups by undergoing a procedure that had more than a remote chance of fatality.

Comments relating to legislation

(other prior to
40),
40,44,45,48,5
9,60,62,63,68,
69,70,72,73,7
6,80,82,86,88,
89,92,94,95,9
9,100,101,102
,105,106,107,
109,110,112,1
13,115,116,12
3,128,133,135
,136,137,
138,147,149,1
52,155,157,
158,160,162,1
67,170,171,17
2,176,178,180
,181,184,192,
194,196,197,1
98,203,205,21
0,214,218,224
,229,231,232,
233,235,236,2
38,
196

Late addition of tail docking section (and ban) following it being thrown out of parliament previously flies in the face of parliamentary process. No new scientific evidence to suggest that these issues need to be considered again. Groups were not consulted prior to the release of the draft Code, even those involved in the original writing group. It should also not be approved having regard to the matters listed at section 73 of the Act.

Submission 196 extensively outlines some issues in relation to the inclusion of this MS in the COW in relation to the legal jurisdiction contained in the Animal Welfare Act.

6,44,

Remove all text about tail docking as not enough notice has been given regarding the changes in this section/may alienate responsible dog owners by including this section.

101

NAWAC must disclose the additional research on which the decision to include tail docking as a MS was based. Significant surgical procedures, including 'controlled' and 'restricted' are defined and covered by the Animal Welfare Act and are not covered by this code (section 2.1). Therefore, why are they covered in this code at all, let alone with an MS?

- (others before 48) 48, 59,86,92,99,100,171, 80,92,99,100, 105,106,107,109,113,121,131,146,152,192,194, 196
- New Zealand is a leader in animal welfare issues – therefore should lead the way on allowing tail docking, not following standards of Australia and other countries
- 196
- Tail docking is approved in many more countries than it is banned.
- 196
- New Zealand should not follow suit of other countries and ban docking as it has specific social and constitutional framework underpinning its society.
- 196
- Legislation in Australia and the UK should not be regarded as a pseudo-precedent for NZ. Legislation in Australia is still lawful in some states and is subject to different levels of restriction from state to state. Implementation has been problematic.
- 51
- Incorrect judgment from vets in Australia and failing to dock a puppy that then requires docking an adult (with the associated complications/expense) has the potential to create court cases against vets.
- 64,101,127,172, 180,196,
- Some of the countries listed as having banned docking have or are in the process of changing the law as it doesn't work.
- 103
- There is a very real chance that breeders will continue to dock tails even if the proposed legislation is adopted.
- 103
- In Germany, a breeder must prove that his litter of hunting dog pups are actually to be used for hunting activities as adults and comply with the FCI Standard. Breeders must get the tail docked within the first 3 days of life by a veterinarian that complies with the FCI standard. The veterinarian then gives the breeder a certificate which is carried with the other pedigree documents for the dog.
- 189
- The rights of minorities should never be compromised at the whim of majorities.
- xx, 231,233,236,238, 217
- ██████ and ██████ both appeared on TVOne supporting the banning of tail docking. The committee is therefore opposed to this practice before we even start. And displays a disregard for an open and unbiased consideration of submissions.
- 196
- It is in breach of the NZ constitution, the consumer protection act and the long term effects on our export meat trade with the EEC and the treaty of Waitangi pertaining to tribal customary rights.
- 196
- This submission (NZCDB) has outlined a number of points in relation to tail docking, use of animals for entertainment, cultural effects and the law. Outlines the requirements to balance the humane use of animals with social benefit. It is submitted that the benefits attained,

including animal welfare, recreational and cultural benefits, far outweigh any temporary pain that may be experienced. See submission 196 for full details.

Comments relating to other species and codes

- 39,40,48,52, 58,62,64,73,94,127,149,166,180,189,197,218
40,58,61,62,202,218,
- Comparison with tail docking in other species. i.e tail docking is being proposed for dogs but not for many other species. Other docking of farm animals is usually performed by untrained farm staff. Maybe you should be looking at this issue instead.
- Resources may be better spent on addressing other issues (e.g dehorning, castration, velvet removal or other farm husbandry procedures) and public education rather than tail docking.
- 96, 178,230,
- Tattoos and microchips (and desexing) in dogs cause momentary pain but they are done for the greater benefit for the dog. The same issues applied to tail docking.
- 102
- In section 8.12.2 it has been stated that preventative removal of dew claws may be justified, particularly in working dogs. This should also apply to working gundogs in regard to their tail.
- 189
- Inconsistency between the proposal for banning tail docking and while other practices are done for preventative reasons. Others are done on the call of the vet and others (export of crayfish) are driven by the export dollar.
- 214
- Tail removal by vets on pups is no more traumatic than the removal of dew claws.

Comments relating to future legislation and review of docking

- 38
- Should these restrictions be put in place, a mechanism that allows a review should also be put in place should the number of injuries of dogs engaged in hunting increase.
- 72
- Suggests that the committee follows up on this ban in 5 years time to see the extent of injuries created on dog's tails.
- 72,185,187
- If tail docking is banned, there must be some kind of accountability/compensation from the committee for all the stress and financial consequences forced upon dog owners – paid for the rest of the dog's natural life. One submission has provided a comprehensive budget for potential costs due to tail injuries.

Other comments in relation to tail docking

- 40 If it is cruel to dock then why haven't prosecutions been made by the SPCA previously?
- 62, Draft code is based on an emotive issue that conjures up emotive images of puppies in pain.
- 64 Wishes to view the literature review that was used to form the recommendation to ban tail docking – also wishes this information to be made public so that individuals can form their own opinions from the literature available.
- 67,192, Typo – Tail injury can be painful and debilitating and will *not* necessarily resolve itself.
- 6,214, Wishes the statement 'removal may also have further impacts on health' to be removed as it is nonspecific.
- 94,101, Argument to ban tail docking is based on emotive misinformation.
- 101 Serious problems have arising in other countries following the docking ban including decimation of the gene pools, dumping of dogs with injuries, relegation from the family home, breaking of tails so to have them hanging 'dead' instead of curling over the back.
- 101 Section entitled 'working and sporting dogs' which was included in draft 6 has been removed. This MS stated that training of working and sporting dogs must be performed by or under the supervision of a skilled trainer and the dog must in some cases retain the tail. If the dog then injured its tail, which then led to the death of the dog, has this section been removed due to the fact that that this could compromise the NAWAC stance on tail docking. Submission states that this is self serving on NAWAC's behalf and this section must be reinstated in the code.
- 186 Considers that breeders know what is best for the dogs, not the people writing the codes.
- 208 There is no reason why not docking is beneficial for the dog. If this ban is introduced to protect dog breeds, the hunting dog group should be exempt from the regulations in order to protect its welfare.
- 224,233,238, All scientific evidence available that this process is cruel or causes pain has been performed on other species. This is not comparable as these species will be at a different physiological stage of development than dogs.
- 231 Should NAWAC proceed with the Code and not remove the sections relating to tail docking and dew claws the NZCDB will vigorously pursue the issue with the regulation review select committee.

Section 9. Behaviour.

Pt	Pp	Submitter	Submission	NAWAC Response
9	40	226	<p>Behaviour, Intro: The SPCA suggests rewording the introduction to read “Inappropriate behaviour is one of the major reasons ...” as the impact of the overpopulation of dogs is probably just as big a reason for euthanasia.</p> <p>Under General Information, the SPCA suggests rewording the final sentence in the final paragraph to read “Uncontrolled dogs can attack companion animals, livestock and wildlife”.</p>	<p>The introduction has been reworded to include this information.</p> <p>The final sentence now reads ‘uncontrolled dogs can pose a danger to other companion animals, livestock and wildlife’.</p>
9	40	211	<p>Behaviour, Intro: suggest ‘appropriate supervision are important and can prevent behavioural problems developing’.</p>	<p>The text has been changed to reflect this.</p>
9	40	211	<p>Behaviour: MS18 (a): suggest ‘Training techniques, including any form of reinforcement or punishment must be appropriate for the individual animal’.</p>	<p>This MS has been changed to read ‘Training techniques, including behavioural modification and the use of rewards, must be appropriate for the individual dog’.</p>
9	40	154,183,	<p>Behaviour: MS18 (a): Terms used for positive and negative reinforcement are used incorrectly in this MS (submission 154 provides definitions). The word ‘punishment’ is more appropriate than ‘discipline’.</p>	<p>The word ‘punishment’ has now been removed from the MS. The terms ‘behavioural modification and use of rewards’ is used instead.</p>
9	40	82,183,195, 211,	<p>Behaviour: MS18 (c). Food deprivation is an appropriate means of increasing the value of a reward when training. Text in section 4 already states that the dog must be fed an optimum diet – hunger is a natural</p>	<p>This is covered by the MS in that ‘any training techniques, including behavioural modifications and the use of rewards, must be appropriate for the dog.’</p>

state and when used to train behaviour, is a transient discomfort. Dogs are often trained just prior to feeding time as the dog is more motivated to work for rewards.

9	40	82	Behaviour: MS18 (c). Many dog handlers who are competing in agility classes will not feed their dog for 8 hours prior to competing as if their dog eliminates in the show ring it will be disqualified. Remove 18 c)	There is no specific reference to food restriction in this section, but all training techniques should be appropriate for the dog and should not cause the dog unnecessary pain and/or distress (as in the legislation contained in the Animal Welfare Act)
9	40	108	Behaviour: MS18 (c). Add words 'or water'. 'Food or water deprivation must not be used in training and performing...'	This covered by the MS in section 4.3 (Water) which states that access to water must be appropriate and in quantities sufficient to maintain vital bodily functions. All training techniques should be appropriate for the dog and should not cause the dog unnecessary pain and/or distress.
9	40	67	Behaviour RBP (b): Care should be taken to ensure that socialization is appropriate to the circumstances in which the individual dog will be kept as an adult (e.g dogs likely to come into contact with livestock should be socialized accordingly etc)	The importance of socializing a dog to the situation in which it will be exposed as an adult has been accentuated in RPB (b).
9	40	68,135,	Behaviour RBP (d): Disagrees that a dog only has to be taken to a training course to learn basic commands – the dog can also be trained at home.	This is an RBP so is suggested as an addition to training at home, with the aim of providing additional skills, rather than a replacement to home training.
9	40	67	Behaviour RBP (d): Training dogs by enrolment in an obedience class should be made mandatory as it is protection for the dog by training out any unwanted behaviours from 'day one'. Completion of obedience courses could then enable owners to access to areas that would be otherwise off limits and/or entitle them to a reduction in licensing costs (or other incentives). Also suggests that prospective owners should have a WoF check of their property and an assessment of the ability of an owner to provide the stability that a dog requires. A further temperament and training test could be	NAWAC disagrees that it should be mandatory but has included the suggestion that dogs should be taken to reputable training courses from 16 weeks onwards to learn the basic commands. New owners registering dogs presently receive a MoF.

performed at 8-12 months to identify potentially handlers or dogs before they become a significant risk to themselves or society.

9	40	156	Behaviour MS: Supports the minimum standard on the acknowledgement that its application is determined by the individual breed (from NZGRA).	OK.
9	40	29	Behaviour RBP (f): Advice can also be sought from breeder and other experienced owners	It is recommended that advice should be sought from a dog behaviourist with recognized qualifications in the field of canine behaviour
9	40	214	Aids for Behavioural Modification MS19: Suggest inclusion of additional clause 'Training aids must not be used in a way that causes pain or distress'.	This information is included in the MS in this section.
9	40	169	Aids for Behavioural Modification MS19: The words 'unreasonable or unnecessary' should be deleted.	This is standard wording in the Animal Welfare Act, and is therefore appropriate to include in the MS.
9.1	41	89,133,171,176,	Aids for Behavioural Modification: The code is proposing a ban on docking, but will however allow the use of painful devices for training purposes. They have not explained in the code how they can have different views on these two procedures.	The use of devices is restricted and tail docking is restricted appropriate to their ability to cause pain and distress (eg some training devices have the potential but do not always cause harm; tail docking always has a particular impact regardless of the way that it is conducted, although the degree of impact can be limited by appropriate practices.
9.1	41	108	Aids for Behavioural Modification: No mention is made of the more unusual methods of behavioural modification such as sensory deprivation or using a fishing line (or similar) to apply force/pressure around the stomach or genital area of the dog. This type of behaviour modification should be banned.	This is covered in the MS by the statement that training aids should not cause unreasonable and unnecessary pain and distress.
9.1.1	42	91	Choke chains, RBP (a): Who is to judge 'competent'?	A commonsense approach should be taken in interpreting this and other recommendations for best practice.

9.1.1	42	6,80,	Choke chains, RBP (b): Remove words 'they should fit comfortably without hanging slack' as they are supposed to hang slack when at rest. Alternative text is suggested.	This has been reworded to clarify that the chains should fit comfortably and hang slack when not being used to correct the dog'.
9.1.1	42	6	Choke chains, RBP (b): Add text 'Choke chains should never be used on long haired breeds. They tangle with the fur and jam causing strangulation and pull out fur in large lumps.'	Text has been added as an RBP to include this information.
9.1.2	42	183	Electronic Devices (a): This should read in a similar manner to 'choke chains a)' for consistency. 'Electronic devices can be harmful if misused and should only be used by competent operators'.	NAWAC disagrees. Due to the potential to cause significant pain and distress it is preferable that these devices are used under the guidance of a veterinarian or dog behaviourist.
9.1.2	42	6	Electronic Devices, RBP: Replace 'electronic' with 'electrical'. The collars are actually electric, not electronic.	NAWAC disagrees. They are powered by their own source (and do not require connection to the mains) and are therefore electronic.
9.1.2	42	178	Electronic Devices, RBP (e): Why not use them? This method has been proven to be very effective and devices are available on the open market.	They have the potential to cause significant pain and distress. They can be effective, but should only be used under guidance of a specialised operator . This has been outlined in the Code.
9.1.2	42	89, 91, 92	Electronic Devices, RBP (e): How is the control of their use to be monitored? How is barking then controlled? Do owners have to have a barking dog euthanized? Suggests to rethink this RBP.	This is an RBP, and not a MS. It is recommended that citronella collars are used instead of electronic collars to control excessive barking as they would result in less serious effects upon misuse.
9.1.2	42	183	Electronic Devices, RBP (e): There are some circumstances when a collar can be used to control barking. Is the point that it should not be left on to control barking or that the dog is unsupervised.	This has been clarified in the Code. It is recommended that remote controlled collars are not left on dogs that are unsupervised due to the potential for malfunction and the resulting serious effects. It is recommended that citronella collars are used for this purpose instead.
9.1.2	42	106,107,111, 113,121,131,	Electronic Devices, RBP (e): Remove words 'and should not be used to control barking'.	It is recommended that remote controlled collars are not left on dogs that are unsupervised (e.g when the dogs are performing

9.1.2	42	133,155,176, 178 101,127,	<p>Electronic devices, RBP: These collars are cruel, painful and frightening to the dog and may affect its long term health. They are outdated and are unnecessary when there are alternatives available. These aids teach a dog to respond out of fear and pain rather than addressing the underlying behavioural problem. The dog does not know where the shock has come from and will link it with the immediate environment rather than with its behaviour – and can go on to develop a fear of things in its environment. There have also been instances where dogs have attacked other dogs or humans at the time of the shock.</p>	<p>excessive barking when the owner is absent) due to the potential for malfunction and the resulting serious effects. The MS states that the collars must not be used in a way that would cause pain and /or distress. Information is given in the CoW recommending that positive methods are used in preference to collars.</p>
9.1.2	42	101,127,	<p>Electronic Devices, RBP: Draft 4b of the COW included the statement that ‘electric collars have the potential to cause extreme distress’. This statement has now been removed. Why is the use of collars accepted by NAWAC whereas tail docking has been proposed to be banned? The inconsistency is unacceptable.</p>	<p>It is recommended that positive enforcement is used in place of these collars, and that they are used only under expert guidance. This is also enforced by the MS which states that these devices cannot cause unreasonable or unnecessary pain or distress.</p>
9.1.2	42	183,209	<p>Electronic Devices, RBP: Disagree with the restriction on who can and cannot recommend the use of electronic devices. Most vets would not necessarily have experience in using devices such as this. Police and government dogs sections must be able to initiate and control the use of electronic devices themselves. The NZ police use these devices in a very limited capacity, but they understand the complexities of their use in behavioural modification and so should be able to use them when necessary and not refer to a vet for guidance. Also a submission (209) saying that animal control officers should be included in the exemptions also.</p>	<p>This is a recommendation for best practice only and someone with experience in dog behaviour and training would be appropriate in this regard, including someone from the police or an animal control officer.</p>

9.1.2	42	226	<p>Electronic Devices: The SPCA is opposed to the use of electronic dog collars (both bark-activated and remote-controlled) by the general public.</p> <p>The SPCA believes that electronic dog collars should only be used under the guidance of animal behaviour professionals, as a last resort. The SPCA believes these collars can easily be misused by the general public looking for a quick solution to a problem, more often than not, related to a barren living environment with little or no social interaction. There are usually better ways of training a dog and/or modifying bad habits by analysing the underlying causes of the problem.</p> <p>The SPCA therefore submits that an additional standard be included which reads “Electronic devices must only be used under the direct guidance of an animal behaviour professional and must only be used as a last resort”.</p>	It has been recommended that they are used under guidance only and the disadvantages of using these devices have been discussed.
9.1.3	42	156	<p>Muzzles: The NZGRA does not support this. Believes that removing a muzzle from a dog while unattended defeats the purpose of muzzling the dog, or at least rendering it unnecessary. Also believe that muzzles should be used to discourage a dog from unnecessary barking.</p>	This has been changed to state that ‘muzzles that restrict breathing should not be left on dogs that are unattended’.
9.1.3	42	169	<p>Muzzles: The following text should be added ‘Muzzles must ALLOW THE DOG TO OPEN ITS MOUTH TO ENABLE PANTING, and fit comfortably without...</p>	An addition MS has been added to cover the fact that dogs should be able to pant, drink and vomit while wearing a muzzle.
9.1.3	42	222	<p>Muzzles: The paragraph should be reworded to read ‘muzzles may be used to stop a dog from biting or eating , to safeguard wildlife, to protect dogs from poison baits or as a legal requirement in respect of certain dogs under the Dog Control Act 1996’.</p>	All this information has been included in this section.

9.2	43	23	Fireworks, RBP (a): Would be preferable to see fireworks banned as not always possible to keep dogs away at all times. Restrict use of fireworks to Nov 5 th only?	This is not within the legislation of the dog CoW.
9.2	43	161	Fireworks, RBP: While the recommended practice is a desirable method, this submission outlines that the dog owners took 2 frightened dogs out for a walk on bonfire night and the dogs eventually got used to the noise and settled down. This may not work for all dogs but is a recommended alternative.	NAWAC acknowledges this comment.
9.2	43	183	Fireworks, RBP: Some dogs will be fearful but others won't. The ones that are not need only be far enough away to be physically safe from the fireworks.	This section applies to dogs that are frightened by fireworks only.
9.2	43	183	Fireworks, RBP: Some dogs may panic if confined. They may be better if they are able to run to a place that they consider to be safe so long as the whole area is secure.	NAWAC agrees. They should be confined within an area.

Section 10. Transportation.

Pt	Pp	Submitter	Submission	NAWAC Response
10	44	212	Transportation, MS 20 (c): 1. the compliance cost of transporting dogs in a transport box will be high with little gain for animals welfare, 2. the provision of non slip surfaces is unrealistic and 3. that dogs are transported out of sight of other livestock is inappropriate as this Code is concerned with the welfare of dogs, not other animals.	1. This ms does not require dogs to be transported in boxes, although this is one option. 2. This remains a recommendation for best practice. 3. Dogs are not required to be transported out of sight of livestock. There are risks to dogs from being transported within a livestock crate containing livestock.
10	44	150	Transportation, MS 20 (d): To first sentence add 'unless in crates specially designed for this purpose, with adequate ventilation'.	The MS outlines the requirement for adequate ventilation.
10	44	183,209	Transportation, MS 20 (d): Some vehicles are especially designed with adequate ventilation to carry dogs. This should be taken into account and included in the RBP.	This will be covered by this MS.
10	44	85,91,111,	Transportation, MS 20 (d): Many people, especially farmers, are not aware of this. What is a vehicle? A quad bike? Suggests that this MS should be removed.	This MS has been removed.
10	44	23,154,209,	Transportation, MS 20 (e): Does not agree with the statement that dogs should not be left in cars and thinks that this statement is too broad – but agrees that they shouldn't be left in when car/weather is hot.	This MS has been reworded to clarify.
10	44	183	Transportation, MS 20 (f): Wording to be changed to 'restrained or contained'?	Wording has been changed

10	44	220	Transportation, MS 20 (f): Has submitted photos and expressed concern on dogs being transported in purpose built kennels on stock trucks – suggests that the dogs may not be free from exhaust fumes and road dust.	Noted. Minimum standard requires dogs to be transported free from dust etc.
10	44	226	Transportation GI, Under General Information, the SPCA suggests adding a second sentence to the penultimate paragraph “Veterinary advice should be sought in the first instance”.	This information has been added.

Section 11. Relinquishing (Changing)Ownership

Pt	Pp	Submitter	Submission	NAWAC Response
11	46	6	Relinquishing Ownership: Alternative text is suggested for this section (see submission 6).	This section has been rewritten to provide suggestions of more options for those wishing to rehome their dog for any reason.
11	46	6,199	Relinquishing Ownership: Remove the reference to taking the animal to a veterinary clinic. Many veterinary clinics would not take in dogs for rehoming.	The reference to a veterinary clinic has been removed.
11	46	17,154,199,	Relinquishing Ownership: The text relating to rehoming the dog is simplistic and does not allow the owner to rehome the dog using any alternative or sensible way by the owner (advertising, finding a new home via other means)	This section has been rewritten to provide suggestions of more options for those wishing to rehome their dog for any reason.
11	46	29,68,80,92,106,107,113,116,121,131,132,135,	Relinquishing Ownership: All efforts should be made to contact the breeder of the dog prior to relinquishment to a shelter or veterinary clinic. Breeders have long term interest and can often help	This information has been included in the text in this section.

to organize rehoming of the dog. Insert the following text at the beginning of the second paragraph 'Where it is found necessary to re-home a dog, in the first instance, all reasonable efforts should be made to contact the breeder of the dog (where possible) to discuss re-homing options and failing that...'

46 222

Relinquishing Ownership: There is a requirement under the DCA for both the previous and new owner to advise the council/s concerned of a change of ownership (section 48). It is an offence to do so and it may be an idea to refer to this in the COW.

This information has been included in this section.

Section 12. Euthanasia.

Pt Pp Submitter

Submission

NAWAC Response

12 46 183

Relinquishing Ownership: This section limits the scope of people to which a dog can be rehomed (e.g ex police dogs are homed to people that the police specifically select as there are many criteria for homing an ex police dog). In general terms a dog should be able to be rehomed to any person who is prepared to take on the commitment of ownership. Perhaps this is all this section needs to outline and could replace the first sentence in this section, and then include the information about shelters etc.

This section has been rewritten to provide suggestions of more options for those wishing to rehome their dog for any reason.

12 47 154,183,211,

Euthanasia: Should also include a statement to the effect that euthanasia should occur quickly and relatively painlessly.

This information is included in MS (a) in this section.

12 47 28,186

Euthanasia: Concern about dogs euthanased by being shot in large numbers by local dog control

NAWAC considers that euthanasia is adequately covered, ensuring welfare is protected, by the minimum standards and

			<p>authorities. Particular concerns about dogs experiencing stress prior to being shot and the procedure being performed incorrectly resulting in the dog being injured but not killed and death not being instantaneous. Has concerns with issues such as this not being addressed while smaller issues such as tail docking are being included in the code. Also has concerns with adequate training of staff employed to carry out these procedures.</p>	<p>recommendations for best practice in this section. The issue of shooting needing to be by competent operators is specifically addressed in the RBP.</p>
12	47	xx,	<p>Euthanasia: Believes the owner should always be present or give permission for the dog to be euthanised. Recommends that this should be re-written to incorporate the fact that permission should be given.</p>	<p>Requirements around euthanasia to prevent suffering are mandated by the Animal Welfare Act. The code cannot supersede the Act.</p>
12	47	212	<p>Euthanasia: The RBP guideline that only a vet or inspector can perform euthanasia of dogs is not practical for many farmers. In regard to RBP b) it would be useful to have a 'fully competent person' be defined or the term replaced with a gun licence holder.</p>	<p>Requirements around euthanasia and acceptable methods have been clarified in the code.</p>
12	47	211	<p>Euthanasia: This may be impractical in many rural situations, where shooting of dogs can be common practice. Shooting, carried out correctly, is quick and painless and would comply with MS 21 (a).</p>	<p>Requirements around euthanasia and acceptable methods have been clarified in the code.</p>
Appendix I	48	93	<p>Appendix 1: Agrees with the diagram of the 'ideal' dog.</p>	<p>Noted.</p>

Additional Comments

Submitter	Submission	NAWAC Response
14, 33, 58,63,78,116,129,145,16 3,175,207	This proposed bill seems to be targeting responsible dog owners. It should be targeting irresponsible owners/breeders who do not provide the necessary level of care for their dogs or register their dogs instead of targeting breeds of dogs and dog breeders.	The aim of the CoW is to improve the welfare of all dogs. Owners of dogs that are not registered and/or are suffering poor welfare are targeted and legislation enforced using other means. It is less likely that these owners will be reading the CoW
207	Dog registration is not covered in this Code. How does the payment of a registration fee to a council ensure the welfare of dogs? Councils should enforce the code and use the registration fee to 1. inform the population of the steps they are taking, 2. enforce the COW for all dogs, not just those that are registered, 3. enforce the COW by supporting those agencies that rehouse and care for stray dogs and enforcement groups, 4. charge low registration to ensure that low socioeconomic owners are able to register their dogs, 5. drop the chip process as it only increases registration fees for already responsible dog owners. Need more education at Xmas time to reduce animal given as gifts etc	Registration of dogs is used to improve welfare of dogs by controlling the stray population and ensuring that dogs are being held in suitable conditions. The full use of registration fees is covered in the Dog Control Act and is beyond the scope of this code.
16,	Fauna of NZ is threatened by cat and dog population – more control of cats and dogs is required. Submission lists a number of criteria to employ over next 10 years to increase control of cats and dogs.	This is beyond the scope of this Code.
30	Supports the code as long as common sense prevails in regards to working dogs and the fact that some of these	It is recognized that some dogs can be more headstrong than others. Training techniques must be applied to comply with all legislation contained in the CoW.

dogs have strong instincts that can make them willful, headstrong and challenging to train.

68

Suggests that all owners should be licensed to own a dog (as with a gun license or driving license) – would reduce need for codes such as this.

Noted.

73,102,180,195,
205,211, 232,

The Code is made up of mostly unnecessary information that won't be read by the general public and the GI sections read more like a dog handbook (particularly the behaviour section). This general information can be found from places other than veterinarians (books, internet). This information could be written as an article to support the code, thus removing the areas of debate and concentrating on the main point of the code – welfare. Some submissions have problems with the repeated references to veterinarians – who they state may have a commercial interest.

Discussed by NAWAC and the idea was rejected. It is considered that the RBPs are essential to promote and increase animal welfare standards and the GI sections give advice on how to meet the MS's. The reader can expand their knowledge using other sources in addition to the legislation contained in this CoW.

205

Non observance of many of the details in this code are at risk of subjective rather than objective interpretation, and further do carry the risk of prosecution for alleged non compliance. Where many owners will not know this law, they will be expected to know this Code from back to front, which can only really be carried out with many years experience of dog keeping.

Owners are only legally required to comply with the MS's contained in this CoW.

205

Immigrants should be expected to obey this code – but only few of them have the appreciation for animal welfare. They should be made to sit an examination, as they do a driving test.

Immigrants are legally required to comply with the MS's as do other dog owners.

205

In view of rangers going from door to door to locate pitbull type dogs, I cannot see that rules in the statute book that will need to be policed in detail will succeed.

The legislation that some breeds of dog are not legal in NZ is currently outlined in the DCA which is enforced by the usual means.

180	There is no recognition in the code of the distinction between 'breeders' and 'people who breed dogs'. In reality there is a vast difference.	All people breeding a dog should comply with the legislation contained in the CoW. No distinction is made between the two groups.
180,181,	When compared with the cat code this code was very different. This code reads more like an 'owners handbook' than a code.	It was considered that this information was necessary to support the MS's contained in the CoW.
181	Suggests that this code makes too many references about taking your dog to the vets, which is commercially based. It seems that no recognition is given to breeders who already exceed many of the standards.	A veterinarian is qualified to provide expert animal care, and so this is why an owner should consult a veterinarian for advice in relation to the health of a dog. Dog breeders vary significantly in their knowledge of canines and ability to provide advice, and so the recommendation to ask a breeder for advice cannot be included in the CoW in every instance.
85	COW has good points but this submission is wondering how the message will get across to the farmer who leaves his dogs for weeks on end without regular exercise, food or water.	Noted. The code will be publicised when issued.
85	Who is going to police the COW?	Enforcement of the Animal Welfare Act and codes of welfare is by government animal welfare investigators and veterinarians, and inspectors of approved organisations appointed under the Animal Welfare Act.
91	Also suggest that a 'Care and Responsibility Booklet' be included with all dog registrations as many people are unaware of a lot of the points in this code.	Noted. Will be followed up when supporting material is released.
93,180,	More attention should be paid to animal welfare issues at dog shows. Dogs are crowded together in a small area and are penned in cages and on a trolley where they stay all day until they go home once the classes have finished. Suggests that this a major area that needs examining and facilities upgrading.	This will be addressed in a separate code of welfare.

93	It is the owners prerogative to keep their dog in any way they wish within their home. Unless cruelty is suspected, there should be no need for housed dogs to be policed.	Noted. This code applies to all people who own or are in charge of dogs in order that dog welfare can be protected.
48,86	Dog breeders are referred to in the scope in a manner that would imply that this code applies to purely pedigree dogs. The code and does not identify those breeding designer cross bred dogs with no controls or follow up etc	This CoW applies to all dog breeders.
101,102	Minimum standards are of very mixed quality and applicability. They do not in some cases reflect scientific knowledge. Questions the absence of min standards in other sections.	Noted.
101	Code seems to be focused towards economic influences rather than the welfare of the dog.	NAWAC disagrees. The CoW is focused towards the welfare of the dog.
102	Some of the minimum standards seem to have been created with the mindset of 'in the perfect world'.	The minimum standards are the very minimum of care that should be provided to the dogs. The RBP's aim for a higher level of animal welfare and are at the level that the dog owner should strive towards.
108,115, 166	Disappointed to note that there is no mention of a ban on the sale of dogs (or cats) in retail stores or market places – this legislation is being proposed in Australia as it has been found that many dogs sold in pet shops are bred at 'puppy mills'. More liability needs to be put on owners of pet shops selling pups and wishes to see the sale of dogs be restricted to registered breeders and animal welfare agencies. Detailed information on responsible ownership should be provided before sale including an animal's expected lifespan, growth, dietary and exercise needs and the cost of ownership. Owners need to be able to contact the original breeders to ascertain the bloodlines and other details relating to their new pup.	This will be addressed in a separate code of welfare.

111	Wishes the code to target farmers who leave their dogs for weeks without regular food/exercise and unregistered dogs roaming the streets and scavenging food. Also cross bred dogs bred for 'cuteness' to be sold to pet shops but sometimes breeding worst traits into the pups. Thinks the code has good points, but wonders how it is to be 'policed'.	Noted.
149	Minimum standards should only deal with serious welfare issues.	It is considered that each minimum standard outlines a basic requirement for care of a dog.
166	There should be more emphasis on breeding dogs of sound temperament and banned the breeding of pups from aggressive dogs. These pups are sold to unsuspecting owners.	Noted.
173	Opposes code as a whole as the legislation that is in force now is never enforced. The solution is not more legislation – but better enforcement.	The legislation is currently enforced.
180	The code does not strike an appropriate balance between animal welfare and the interests of breeders who are imbibed in the culture of pedigree dogs.	Noted.
189	Under the current proposal farmers and police will not be permitted to shoot dogs.	Text has been added to state that dogs may be shot, if necessary, by a competent person.
189	Code is anthropomorphic.	The Code is based on sound knowledge of canine behaviour and physiology.
195	Concerned with the lack of ability to seek exemptions via veterinary or specialist support.	Veterinary support has been recommended in cases where it is deemed to be beneficial for the welfare of the dog.
195	The code does not represent dogs from all places within society. Owners have different relationships with their dogs (working, surrogate children, companion, money maker etc) and the code should be appropriated to dogs in all areas of society.	The code covers all dog owners and persons in charge of dogs, regardless of their background or situation.

195	Short lived distress is sometimes required to prevent long term distress and enable behaviour modification so that a dog is compatible with society. A dog that has lived free from human induced distress and given as many of the 5 freedoms as possible, you could argue is closer to a 'wild' state. (e.g short lived stress could be caused by a car trip, confinement in a kennel, use of a choke chain, demonstrating of alpha behaviour by humans by letting dog eat last etc)	Noted.
195	Many additional suggestions for improving the code are given at the end of submission 195.	Noted.
199,200,232,	Much of the content is prescriptive and many owners do not wish to use commercially based products. This is not catered for under this code.	Disagree. Dogs can be managed without commercial products according to this code.
204,207	These submissions are against the new laws for destroying/neutering menacing dogs. More action should be taken against the owners and more education should be provided in schools. This is the only way in which children are going to grow up and learn to treat animals correctly. Dogs are like kids. In a basic way, if you bring them up well, they will be basically good citizens, if you treat them badly, they will rebel.	Outside of the scope of a code of welfare made under the Animal Welfare Act. This are is covered by Department of Internal Affairs.
207	Provide assistance for those willing to recognize that they have a problem with their dog. The dangerous dog issue should be addressed at the owners, not at the dogs.	It is considered that the CoW is directed at the owners, rather than the dogs. Assistance is provided to help owners seek help with dogs that are a danger/menace to society.
205	Religious practices should not influence the way immigrants treat animals in NZ. If they live here, they should be made to obey the law like everyone else.	The code covers all dog owners and persons in charge of dogs, regardless of their background or situation.

206	This submission has included many minor suggested changes in text that have not been included in this table. Refer to submission for actual text.	NAWAC has acknowledged these suggestions.
212,	Fed Farmers do not believe that a code of welfare is necessary in respect of working dogs. The COW has also inadequately addressed the needs for farmers who work with dogs. Farmers suffer financially if they provide a poor level of welfare for their dogs and have devised over time effective and workable COP with respect to the treatment of their dogs. The COW are too prescriptive and do not make allowances for the practicalities of the 'working dog' scenario. Also see other discussion of requirements of working dogs in relation to the enforcement of MS's in the proposed Code (submission 212).	The CoW provides legislation in the form of minimum standards for the very minimum care that a dog should receive to ensure its welfare. It is considered that owners of working dogs should be able to comply with these standards.
214	Submission 214 has included an article on head halters and the potential harm that they can do with misuse.	Noted. This code covers all tethering and training devices.
216	Time period allowed for submissions to be submitted was insufficient.	The time period allowed for submissions was standard.
222	Dept of internal affairs are especially supportive of sections 1.1,1.2,3,3.1,5.1,7,7.1 and 9.	Noted.
223	Has submitted a detailed document outlining the disadvantages of placing a maximum weight and measurement for miniature dogs in the show ring.	This is not discussed in this CoW as it is an issue that should be addressed with authorities involved in dog showing.
225	The NZDF did not see that the introduction of a code was necessary for them as they already complied with the standards in the code. The dogs are always kept in the best standards available to them at the time (meeting conditions of the MS), but these conditions may not, in all circumstances, meet with the RBP (e.g when forces are	Noted.

housed in tents etc). The NZDF are happy with all aspects of the Code.

226, 237	SPCA requests a different route to be taken (and [REDACTED] is speak to [REDACTED] re this matter) than that of the COW for cats.	Reference made to 'bringing the animal to the attention of an inspector' has been removed from the CoW.
211	Submission 211 also includes many other suggested changes in text from the NZVA.	Amended as appropriate.

Support or Oppose with no additional comments

120,148,	Supports all aspects of the Code
26, 31, 153,173,	Opposes all aspects of the Code

Note:

- Submission 10 – unsure if supporting or opposing tail docking.
- I have classified 'further impacts on health as future health problems and or complications during docking other than pain or distress
- Submission 29. Thinner breeds of dog may be more sensitive to anaesthesia due to low body fat:weight ratio.
- Submissions 43, 46, 47, 50, 53, 55 and 57 – same.
- Submission 52 – suggested changes for the Animal Welfare Act and other procedures have also been outlined within this submission
- Submission 58 – outlines advantages of using suggested correct procedure to dock dogs and the differences when compared with incorrect technique.
- Submissions 46 and 74 are from the same person
- Submissions 80 and 84 are exactly the same (same text and person submitting – therefore have only included 80)
- Submissions 47 and 75 are from the same person
- Submission 128 is also acknowledged as submission 210
- Submission 160 has same address as submission 157. Some of the text is the same also.
- Submission 227 also includes some additional information on legal aspects of the Tail Docking law in the UK.
- Submission 103 outlines a number of studies that have been performed to assess the amount of tail injury in dogs that have not been docked – also many other points