

# Summary of submissions received on the public draft of the Animal Welfare (Goats) Code of Welfare 2010

## 1) Overall summary of submissions

(Excluding late submissions, which have been summarised in Section 4.)

Of the 549 submissions received, 432 were SAFE form letters and 46 submissions supporting SAFE (i.e. obvious connection due to similar content and wording as SAFE form letter; marked in the below Table below as SAFE +). Of the remaining 71 submissions, 4 also voiced their support for SAFE.

Six submissions contained answers to the nine questions posted in the Chairman's letter 29<sup>th</sup> April 2010 and are presented according to question in Section 5 of the present report.

Overall, the need for a Welfare Code for goats has been supported and submitters have welcomed the opportunity to comment on the Draft Code of Welfare. However, several main areas of concern have emerged, and many of the submissions have been very passionate in their appeal to NAWAC to change the Draft Code in these areas in favour of goats. These areas include the following:

- Tethering of goats, in particular along roadsides
- Indoor housing of goats
- Separation of kids from their does
- Painful husbandry procedures, in particular debudding and dehorning

The following attachments have also been submitted:

Submission 2: Several newspaper articles

Submission 23: Article and poem about tethered goats

Submission 41: Article by Ron Kilgour (Feral goat behaviour – a management guide)

Submission 90: Newspaper article

Submission 254: Photos of goats

Submission 485: Website address for article on tethering (<http://www.tewahanui.info.wordpress2/?p=3215>; not available anymore)

Submission 512: Photos of goats

Late submission 14: News headlines

## **2) Table of submission details**

### 3) Detailed summary of submissions by section

Section of Code	Submission #	Submission	NAWAC response
<b>General comments</b>			
	1	An additional section is needed covering the sale or disposal of goats. A section needs to be inserted requiring owners of goats to satisfy themselves that any new owner of their animals is competent to give them the required standard of care, e.g. "Goat owners are responsible for satisfying themselves, before disposal, that any new owner is capable of meeting this Code of Welfare".	Noted
	5	Strongly opposes draft Code.	Noted
	6	Supports SAFE.	Noted
	7	Asks for minimum standards to be made more rigid, meaning that high welfare standards have to be adhered to by law. Every goat has the right to a high welfare standard and if the Code was "water tight" then there would be no goats "slipping through the cracks".	Noted
	13	DOC's pest control activities that overlap with the activities addressed in the Code (e.g. animal handling, restraint and tethering goats) easily meet the minimum standards; and go beyond the standards for the welfare of handling Judas goats, which have to be handled very carefully so they don't get stressed and die.	Noted
	16	Would like to have a response to this submission and is looking forward to reading the new welfare Code for goats outlining that tethering and dehorning has been banned.	Noted
	21	Concerned member of the public with regard to our unfair treatment of goats.	Noted
	25	Advocates that goats are farmed safely, protected from attacks by other goats by applying safe farming methods. They need space and shelter, water and food.	Noted
	41	Wish to thank drafting committee for receiving and incorporating previously submitted suggestions.	Noted

		<p>The dominance of dairy goat influence in the authors and advisers is obvious, and emphasises the problem of incorporating goats that are farmed separately for milk, mohair, cashmere, meat, weed control and pets into one Code. That is not to suggest that there should be different sector Codes, but the need for generic and universal language, principles and practice. Each different type and breed of these goats has different behaviour, dietary needs, husbandry routines and commercial parameters, and this needs to be clearly understood.</p> <p><u>Role of education</u></p> <p>It is worth emphasising two important general points. First, that goats are different from sheep and cattle (because new and/or less experienced farmers often try to treat them similarly) and second, that goats are more prone to stress than sheep and cattle, which can manifest in health and behavioural problems. For example, 2.1 Introduction could include the above statement.</p> <p>Including some educational material raises the question whether the Code is the best place and method, but also creates dangers by not including enough of the specific topic (example: Section 5.5, last sentence on grain feeding. To be useful advice it needs amplifying to ensure that goats are trained to accept grain as a feed if it is ever to be used as emergency feed). On the other hand there can be expected to be farmers new to goats, who need educating. However, any educational elements could become less useful if not meaningful because of the generalisation necessary to reflect different goats, breeds, their use and management. (example Section 4.3 General Information: about the use of toys and not other points; example Section 3.1 RBP: could emphasise that goats eating pasture have different height and content needs to sheep, that bruised pasture can be as unacceptable as other contamination, but that goats will readily adept to the best feed available at the time. But that then requires further elaboration. Maybe should just delete second sentence of (f).)</p>	
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		On balance it could be preferable to delete educational elements included in General Information sections and Recommended Best Practice sections rewritten in such format.	
	45	Has witnessed shameful abuse of goats and wants them protected by an improved Code of Welfare.	Noted
	49	Considers Code to be a clear document covering minimum and recommended practices well. Does not see this draft Code adversely affecting or impacting on good farming operations.	Noted
	73	Wants more protection for goats.	Noted
	117	Is disturbed that the welfare of animals such as goats is consistently and conveniently ignored in NZ. Has no issue with farming goats or gaining other benefits from keeping them, but these animals deserved to be allowed to live their lives in a way that allows them to engage in their natural behaviours and without pain and suffering.  It has been repeatedly proven that casual cruelty and general disregard for the welfare of stock-type and domestic animals has ripple effects in the general attitudes and wider actions of our society.	Noted
	125	Hopes that in the future New Zealanders will come to realise the importance of compassion and empathy to animals that we consider domestic, that no animal is just a dollar amount.	Noted
	156	Wants more protection for goats in farming and other situations.	Noted
	160	Need to make use of the scientific knowledge and data which shows without doubt that goats are intelligent sentient beings who deserve every right to be protected against cruelty. The Code review supports economic expediency over good welfare and gives the illusion of positive welfare by lacking real welfare substance.	Noted
	164	Has had pleasant experience with a caring goat farmer whose animals were friendly, loving, entirely non-stressed and loved by all. In contrast to this sees how goats are treated in other circumstances.	Noted

		Is hoping that the hearing of submissions is done on the basis of caring and in the best interest of the animals.	
	172	Expresses utter dismay at the way goats are treated in our country.	Noted
	176	Support SAFE.	Noted
	189	Ask NAWAC to carefully consider SAFE's requests. Goat farmers should be consulted before making judgements on what goats are expected to endure, and do not subject goats to different rules from our domestic animals, this is speciesism.	Noted
	192	Do not feel the new Code goes far enough to uphold goat's welfare. Please uphold the principles of the AWA and ensure better welfare for goats in NZ.	Noted
	194	Code needs to be vastly improved in favour of goats (they are intelligent and have feelings too). (Has added story on how her family were able to raise orphan lambs sucking from nanny goats and that mortality rates in lambs went down.)  Opposes slaughter of goats (and other animals) for meat consumption.	Noted
	224	Supports initiatives put forward by SAFE.	Noted
	238	Wants more protection for goats.	Noted
	243	Does not expect that NAWAC will take notice of petition, but hopes that NAWAC will adopt the practices outlined in SAFE form letter.	Noted
	269	Considers a Code of Welfare for goats necessary.  In the consultation document, submitters are invited to discuss the disadvantages to them arising from the Code, such as compliance costs, and advantages, such as market gains. Wishes to respectfully remind MAF that the Code is being prepared for the welfare of goats, not the welfare of businesses. The welfare of businesses should be beyond MAF's scope. Goats should be adequately fed, watered, sheltered, protected from abuse, and should be able to express their normal behaviour, as required by the AWA.	Noted
	269	Applaud this draft Code which was long overdue.	Noted

	270	<p>Applauds NAWAC's intention to codify welfare provisions for domestic goats.</p> <p>Strongly supports SAFE's recommendations.</p>	Noted
	273	Hearing of cruelty to animals in our own country is upsetting. Wants more protection for goats.	Noted
	281	Code of Welfare for goats not only necessary, but well overdue. There seems to be a significant lack of understanding in the rural community about the needs of goats, particularly in relation to shelter and overall behavioural needs.	Noted
	290	Should include all goats in animal welfare legislation.	Noted
	294	<p>Appreciate opportunity to submit on the draft Code and happy to discuss any aspect of the submission. Majority of members are farmers and are involved in the industry for commercial reasons. This submission is made from this perspective.</p> <p>Are generally supportive of the draft Code. Animal welfare is prime consideration of members and the Code covers most activities in this respect that should be included in such a document. The Code is very basic, but it is acknowledged that the Committee has ensured, in taking this approach, that its guidelines can be easily understood by anyone entering the industry.</p>	Noted
	312	Would like to see the general public educated as to the needs of these intelligent sociable animals.	Noted
	320	<p>Welcomes opportunity to comment on the draft Code. Good to see this perhaps somewhat neglected species covered by a Code. Generally supportive of the provisions of the Code.</p> <p>Many of the example indicators are directed towards farming situations rather than individual goats kept as a companion animal.</p> <p>There is quite a bit of repetition, particularly in regards to the relationship</p>	Noted

		between shelter, shearing and food intake, where there are occasions where information is inappropriately placed.	
	384	Wants more protection for animals in general.	Noted
	408	Realises that the Code does not apply to goats as 'wild animals' by the Wild Animal Control Act 1977. However, asks that feral goats be better protected from hunting practices.	Noted
	414	Believes the Code will not protect goat welfare in NZ.	Noted
	418	While it is great to hear that the Code is being reviewed we should take this opportunity to take a stronger stance in some areas of the Code.	Noted
	421	Better protection of goats is needed in NZ. The current laws are unsatisfactory as they are inhumane.	Noted
	426	New Code does not go far enough to uphold welfare of goats.	Noted
	456	Supports SAFE.	Noted
	457	Absolutely need a Code of Welfare specifically for goats, as they are treated differently to other livestock. Minimum standards should be forceful so that the Code does not have to be redrafted. Submitter's American friends have the belief that in clean, green NZ animals are treated well. Bad treatment and cruelty to farm animals betrays that brand, and in the future ethical people with money will value NZ's produce being 'green'. It is valuable to our future generations to help NZ keep that point of difference in value.	Noted
	463	Wants more protection for animals in general.	Noted
	487	Wants more protection for animals in general.	Noted
	490	Wants more protection for goats.	Noted
	494	Asks that recommendations by AWA, SPCA and SAFE are supported.	Noted
	496	There needs to be explicit provision for goats to live as natural a life as possible. This includes food, water, shelter and rest and a caring and peaceful environment.	Noted
	497	Support standards of care for goats contained within the draft Code of Welfare.  Provide a list of what goats should be provided with such as dry standing	Noted

		places to avoid foot rot, care in transportation, intellectual stimulus and so forth.	
	498	<p>Appreciates opportunity to make this submission and acknowledge work of NAWAC.</p> <p>Supports that a Code of Welfare for goats is necessary.</p> <p>Supports the draft Code, as it is based on good practice, scientific knowledge and available technology.</p>	Noted
	510	Please draft a Code that gives goats a decent living. Guidelines are just that, but as we know the looser the rules the more room there is for abuse.	Noted
	511	<p>Organisation welcomes the opportunity to make a submission and would welcome the opportunity to make further submission on the revised draft of the Code following NAWAC's consideration of the public submissions.</p> <p>Overall the Code is adequate in its content to improve the welfare of goats, but needs strengthening by means of re-wording or adding specific minimum standards. Often the best practice or example indicator points were those that should have been considered minimum standards.</p> <p>Code should not only encourage good animal welfare, but assist in enforcing the standards and aiding animal welfare inspectors to enforce the AWA. It is suggested that future Codes are constructed in a similar manner to the way they are currently, but with any minimum standards being listed in such a manner that they can run alongside the wording of the AWA 1999, maybe each minimum standard could even be paired with a specific charge or section of the Act through which it is enforceable.</p> <p>Codes are written to ensure the welfare of animal in question, not to provide 'ideas' as to how it might be done. It is only sensible that the minimum standards are able too be successfully enforced either through</p>	Noted

		compliance checks or court action. It detracts from the point of such regulations if the compliance with said regulations cannot be enforced due to poorly worded standards that cannot be easily recognised as ingredients of an offence.	
	515	Urges for better care and welfare standards for goats.	Noted
	530	Supports submission by SAFE and the SPCA.	Noted
	533	Supports submission by SAFE.	Noted
	545	<p>Thank NAWAC for opportunity to make a submission and welcome the opportunity to make further submissions on the revised draft following public consultation.</p> <p>Overall, Code is adequate in its intent to improve the welfare of goats in commercial operations. However, it falls short in the care and management of solitary goats.</p> <p>Several areas in which the Code could be strengthened to better describe the handling of farmed goats. These have been outlined adequately by the submission from the Wellington SPCA and we are in full agreement with this submission.</p>	Noted
	548	Welcomes opportunity to comment on the Code.	Noted
<b>1. Introduction</b>			
1.3	41	Should extend the final sentence by adding "...and controlling weeds as part of pasture management" to reflect what most goats in New Zealand are farmed for.	Disagree. Most goats are not farmed for weed control.
<b>2. Stockmanship and Animal Handling</b>			
2.1			
<i>General comments</i>	160	There must be a requirement that all handlers on farm or in peri-urban environs are trained in low stress handling, goat behavioural courses and the requirements of the animal welfare legislation to ensure handlers understand their obligation under current legislation and are given the skills with which to behave according to the AWA.	These requirements are covered in MS1 and throughout the CoW.

	192	Support improved training standards and requirements for goat handlers on commercial farms.	Information on training for stock handlers has been included within the section.
	320	The last two sentences of the third paragraph of the introduction of this section (i.e. 'Personnel should undergo training..... Any contract or temporary staff....') has already been covered in MS #1.	Agree. But introduced and discussed in introduction.
	453	Supports improved training standards and requirements for goat handlers on commercial farms and wants this extended to some sort of basic training for anyone who wants to care for goats, including basic husbandry skills, knowledge of poisonous plants and definitely the nutritional needs of goats, as lack of this knowledge leads to unnecessary suffering, short and long term.	Information on training for stock handlers has been included within the section.
	515	Urges for improved animal welfare education for handlers of goats.	Noted.
<i>MS #1</i>	547	This standard does not cater for a typical lifestyle block owner with pet goats. Whilst the owner should have familiarized themselves with goat care, to expect every pet goat owner to attend a goat husbandry course would be unreasonable, and the level of record keeping stated is neither required, nor beneficial to the average pet goat. These requirements need to be updated to include suitable minimum stockmanship requirements for non commercial pet goat keepers.	MS is outcome based for this reason.
<i>Example indicators MS #1</i>	294	Support the intent of this standard, but question whether the example indicator 2 or the recommended best practice are practical under today's conditions. Are not aware of any training courses, including NZQA, that specialise in goat husbandry. The experienced practitioner provides most suitable training on today's goat farms and the Code should reflect this.  Recommend the wording of point 2 should read: ' <i>Training of staff, including stock handlers and (goat) farm managers should be undertaken by supervisors who have competence in the husbandry of the goats within the particular locale and circumstances.</i> '	Noted. But example indicator and RBP only.

	320	It is difficult to see how these might apply to owners of individual goats as companion animals.	Example Indicators only. CoW applies to all persons in charge.
2.2			
MS #2	294	Support inclusion of MS for tethered goats in this Code. Tethered goats are often kept by people not experienced in goat management and the inclusion of this section will contribute markedly to the welfare of animals kept in this way.	Noted.
	511	Add the following clauses: (i) Tails must not be lifted or twisted when moving goats. (j) If it is necessary to use dogs, they must be under control at all times and muzzles where appropriate. (k) Aggressive animals must be separated, given additional space allowance and kept in yards for the minimum time necessary to carry out the husbandry procedure needed.	Remain as RBPs – all owners and persons in charge must meet MS in that ‘pain, injury and distress must be minimised’.
Example indicators MS #2	1	Immediate care and attention for injured animals during handling may not be possible if there is no vet on site. Minimum husbandry and first aid is possible immediately but specialized services can only be provided as soon as reasonably possible. I understand the thought behind the requirement on Page 9 for immediate attention, but Page 9 should be modified to require attention ‘as soon as reasonably possible, including access to specialist advice’.	Agree. This has been deleted and the need for veterinary care/attention is covered by MS18.
RBP	294	Goats should not be introduced to a tether regime it is has not been brought up to this existence and that this should be indicated in the example indicators.  The wording of point 1 should be altered to read: ‘Goats that are tethered are calm, have been trained <i>as kids</i> to accept tethering, and accept human approach.’	Agree. Included as EIs of section 2.3 ‘restraint and tethering’.  Disagree. But text incorporated and moved to example indicators.
	320	b) The sentence ‘Stress increases the aggression level of goats.’ Should be	Agree. Moved to the

		in the Introduction or General Information section as an explanatory statement.	general information in this section.
	511	Points d, e and g should be minimum standards, in particular the point regarding dogs used in mustering. Mustering is already a time of high stress and possibility of being bitten by uncontrollable dogs should be minimised.	Disagree. Remain as RBPs – but all owners and persons in charge must meet MS in that ‘pain, injury and distress must be minimised’.
2.3			
	57	<p>Would like the following included:</p> <p><b>COLLECTION OF FERAL GOATS FOR COMMERCIAL SLAUGHTER</b></p> <p>Now that goat meat fetches high prices at the works, there has been a corresponding explosion in the number of farmers deliberately breeding up feral goats on their property. Goat musterers are then used to collect these goats for trucking to slaughter.</p> <p>The musterers gather feral goats as they catch them into holding paddocks where they are left until sufficient numbers have been mustered to make up a truckload. These paddocks frequently have little or no shelter and sparse feed. It is important to remember that</p> <ol style="list-style-type: none"> <li>1. Goats unlike sheep cannot tolerate cold and wet conditions. They must have shelter otherwise they are prone to pneumonia.</li> <li>2. Feral nannies kid twice a year. They kid in June/July i.e. mid- winter, which in my part of New Zealand can be very wet and very cold with temperatures below 0 degrees. Nannies and newborn or very young kids are especially vulnerable to lack of shelter and poor feed.</li> </ol> <p>I recommend that goat musterers must provide a holding paddock with proper shelter and adequate feed. That goats are not kept for more than seven days in holding paddocks. That any nannies due to kid or nannies with young kids not be sent to the works but returned to the bush. Or a ban on collection of feral goats from June until the end of August</p>	Disagree. But persons in charge must meet requirements of the CoW once the goats are deemed to be under their care (i.e during mustering and in holding yards).

		allowing for the birth and weaning of feral kids.	
<i>MS#3</i>	511	MS should include the words ' <i>unnecessary or unreasonable pain and/or distress</i> '. Inclusion of similar phrasing to that in the AWA 1999 assists with clarification and aids enforcement of any possible breach.  Should add the following clauses to MS#3: a) Goats being moved on foot must not be forced to proceed at a pace likely to cause unnecessary or unreasonable pain and/or distress including exhaustion, heat stress or injury. b) If any goat being mustered or driven is seen to have difficulty breathing (mouth open and/or tongue hanging out) then it must be allowed to rest and recover. c) Where injuries occur while mustering goats, goats must receive immediate attention and care or be humanely destroyed.	Disagree. The clauses below are covered by the current MS4, MS18 and MS19 and the accompanying indicators.
<i>Example indicators MS#3</i>	320	Should this section be 'Mustering, droving and yarding'? Otherwise points 4 and 5 of the example indicators seem inapplicable.	Point 4 removed. Point 5 deals with the fact that if animals are mustered carefully, they will be less stressed upon arrival at the yards.
	511	Points 3 and 6 should be minimum standards. Any mustered goat having difficulty breathing should be allowed to rest and recover, any injuries occurring during mustering must be treated immediately. Both actions comply with the AWA.	Covered by MS4 – mustering and droving and MS18 – health.
2.4			
<i>General comments</i>	192	Mixing of unfamiliar goats or herds should be avoided wherever possible. Studies have shown evidence for increased stress in goats that have had group cohesion disrupted.	Agree. This is reflected in the text.
	446	Goats should not be forced to mix with unfamiliar goats regularly as this makes them anxious. The new Code should require that goats are kept in	Agree – see above. However legislating

		groups in similar numbers as they would live in under natural circumstances.	for group sizes is not practical under many situations.
2.5			
	2, 3, 7, 8, 9, 16, 17, 23, 38, 45, 90, 91, 102, 105, 108, 125, 164, 172, 206, 224, 230, 254, 269, 270, 274, 279, 300, 312, 384, 388, 403, 414, 418, 421, 426, 446, 469, 471, 473, 475, 496, 497, 512, 513, 515, 518, 520, 521, 523, 528, 545, 546, 453, 192, 194	Wants tethering of goats to be banned altogether.	Noted. NAWAC believes a full ban is not practical – but additional requirements have now been placed around the tethering of goats.
	403	Tethering is in breach of the AWA.	Additional requirements have been placed around the tethering of goats to ensure that when tethering, the practice meets the requirements of the AWA.
	413, 443	Tethering is unacceptable as it is cruel.	Additional requirements have been placed around the tethering of goats.
	45, 124	The SPCA is opposed to tethering with good reason, as there are more complaints to them and MAF regarding goats than any other animal. NAWAC have stated that goats should not be tethered, but the draft Code does not prohibit this practice. Why?	Additional requirements have now been placed around the tethering of goats. The keeping of

			goats in herds has been included as a RBP.
	2	Wants tethering of goats to be banned altogether. If an allowance has to be made for occasional, short-term tethering, such as at a school's lamb and calf day, the rules should be no different for goats than they are for other animals, such as sheep and cattle. And if a total tethering ban cannot be implemented, then, as a very minimum, roadside tethering of goats should be banned.	Additional requirements have been placed around the tethering of goats.
	1	Smallholders with a small number of goats may have a single buck or single buck kids which may be held separately from does and kids. The draft, while recognizing the desirability of providing company for goats, needs to allow for smallholders where the increased human contact can be used to offset lack of herd company for single animals.	The code recognises that other species can provide social companionship for goats.
	1	When running goats on a line a swivel is needed between the collar (or halter) and the leash-line when on a ground peg or running line. This allows the goat to turn frequently even if the leash-line gets caught, without throttling itself. Without a swivel the leash-line can start to kink, twist the collar and tighten it on the goat's windpipe. This should be an MS.	This is covered under MS3 a) in that the equipment must be fit for purpose.
	2, 269, 312, 369, 418, 421, 490, 512, 513, 520, 192, 25, 38, 45, 172, 230, 274, 300, 513, 521, 105	Tethered goats have no means of escape and roadside goats have a high visibility and are vulnerable, making them more prone to attack by aggressors such as dogs and humans	NAWAC considers that they are at a similar risk of attack in a field near a roadside. Increased inspection of the goat has been included as a requirement when tethering.
	224	Goats are left helpless in the face of any aggressor such as dogs and humans (Submitter has attached news stories of attacks by people on	NAWAC considers that they are at a

		tethered goats in the Franklin District). They accept human approach and, in contrast to tied-up dogs which may be able to wriggle out of their collar, goats will not be able to escape due to their horns.	similar risk of attack in a field near a roadside. Increased inspection of the goat has been included as a requirement when tethering.
	17, 90, 108, 164, 217	Tethered goats are at the mercy of dogs, people and the elements (e.g. recent incidence in Franklin area where a goat was dragged behind a car and left to die).	Additional requirements, including increased frequency of inspection, have been placed around the tethering of goats.
	2, 164, 206, 217, 312, 418, 512, 513	Road traffic must be frightening, exhaust fumes must be damaging to goat health, fumes, dust and flying debris must contaminate food.	Noted. Additional requirements have been placed around the tethering of goats.
	18	Tethered goats are extremely vulnerable to neglect and abuse (lists a variety of examples). When the get tangled there is danger of dehydration if not found in time. Refers to an article in the “Listener” by a German tourist highlighting the plight of NZ goats and the lack of shelter and often water.	Additional requirements have been placed around the tethering of goats – including the equipment used to tether and provision of water. All persons in charge must also meet all other requirements of the CoW.
	520	Goat is at risk of danger by vehicles and by the goat itself if the tether is broken.	MS added to say that goat must be tethered to be away from path

			of vehicles and equipment used for restraining must be fit for purpose.
	2	The use of the term ‘Tethered goats’ in the heading of this section instantly given the practice a degree of legitimacy. This could be avoided by changing it to ‘tethering goats’, which switches the focus from the victims to the persons inflicting the practice. The use of ‘tethering’ would also be in line with terms used in other sections such as handling, mustering, etc. The introductory sentence to this section of the Code gives a list of tethering situations the wording of which makes the practice sound normal and indeed adds to the legitimacy already bestowed by the section heading. The worst part is the use of roadside tethering in such a conversational way.	Agree. Section has been changed to ‘restraint and tethering’.
	2	It is wrong to have a separate Minimum Standard headed ‘‘Tethered Goats,’’ or even ‘‘Tethering Goats.’’ Tethering is a restraining practice. Consequently, it belongs under Minimum Standard No. 2 – Animal Handling and Restraint.	Agree. Section has been changed to ‘restraint and tethering’.
	2, 8, 23, 287, 312	Tethering of goats no longer serves a purpose (many types of mowers available now) and submitter strongly objects to tethering. Keeping verges free of weeds is done by councils by weed spraying.	Disagree. Some places not accessible by mowers.
	367	It is not okay to spend any amount of time tied up by the road, without any company and being restrained to that spot for a lifetime. Goats have become nothing more than cheap lawnmowers.	Additional requirements have been placed around the tethering of goats. RBPs and general information have been added accentuating the importance of social companions.

	2	Grazing animals should be kept behind proper fences on the owners property or the gullies mentioned in the Code should be fences off by the owner so that goats can graze in a civilised manner in accordance with good animal husbandry practices.	Agree. That goats prefer to be in herds is outlined in a RBP and in the general information.
	9, 19	Supports a complete ban on tethering of goats, as these are sociable animals and should be kept in groups, either securely fenced in a paddock with shelter provided, or in indoor housing. Tethering is an outdated practice that leaves goats vulnerable to attack. Has previously reported neglect of a goat to the SPCA.	Additional requirements have been placed around the tethering of goats. Social requirements for goats are outlined in RBP and general information.
	8, 9, 17, 23, 65, 102, 124, 230, 45, 269, 287, 312, 384, 413, 469, 471, 521, 105, 192, 194	Goats are social animals and being part of a herd plays a vital role.	Agree. Outlined in RBP and in the general information.
	2, 426	Submitter cannot imagine anything the intelligent, social and freedom-loving goat would hate more than being separated from her mates and hooked to a chain by the side of the road.	Noted. Additional requirements have been placed around the tethering of goats. Social requirements for goats are outlined in RBP and general information.
	369	These are highly intelligent, social animals and we are denying them their rights under the AWA by allowing this practice to continue.	Additional requirements have been placed around the tethering of goats to ensure that when tethering, the practice meets the

			requirements of the AWA.
	246	Goats love company, but are often seen tethered at the side of the road without any stimulation and in a stressful environment where cars are driving past and they are unable to get shelter or adequate food. It should be illegal for goats to be tethered and they should be allowed to stay in groups in either an outdoor fenced environment with adequate shelter or an indoor area with sufficient room to run, rest and sufficient food and drink.	Additional requirements have been placed around tethering to ensure that goats have their needs met. The importance of social companionship is outlined in a RBP and in the general information.
	418, 520, 45, 105, 192	Goats suffer from stress when isolated.	Agree. The importance of social companionship is outlined in a RBP and in the general information.
	512	Has studied goats on their lifestyle block and has discovered that it is important for them to have company. If goats must be tethered, the new Code should stipulate that they must not be alone but should be with another goat that is compatible.	The importance of social companionship is outlined in a RBP and in the general information.
	513	Off the road, if goats are tethered, the Code should stipulate that they must be kept in at least pairs (which are compatible), as goats are herd animals and it is cruel to keep them on their own.	The importance of social companionship is outlined in a RBP and in the general information.
	329	Given previous comment about the social nature of goats, suggest there is need to address this further for tethered goats. Perhaps tethered in pairs or in sight of other domestic animals?	Social requirements for goats has been included in the general

		If tethering is going to be allowed at all, this section should include the necessity to protect tethered goats from human and dog interference. For instance, it would be inappropriate to have goats tethered beside major roads. Should they only be tethered within sight of owner's house for instance?	information. NAWAC considers that goats are at a similar risk of attack in a field near a roadside. Increased inspection of the goat has been included as a requirement when tethering.
	7	NAWAC recommends minimum standards of being checked once every 12 hours, but sadly these goats are at continual risk from low life New Zealanders at any time day or night.	Noted.
	230	Goats tethered along roadsides are subject to lack of care.	Additional requirements have been placed around the tethering of goats and tethered goats must also meet all MSs in the CoW.
	384	Animals should not be constrained by the neck as constant pulling could result in injuries.	MS has been included to ensure that equipment used for restraint must not cause stress or risk of injury.
	453	The mentioned checking of 'every 12 hours' as part of a MS is unacceptable, as goats can become entangled in the tether and harm themselves greatly within this time period.	New MS included that goats must be able to move around with undue hindrance.
	13	One area which may be beneficial to clarify in the Code, if considered within scope, is the period of how long a goat is "tethered" for (also	Goats in this case would have their

		section 1.3). This is relevant to DOC's Judas goat operations in that if a goat is restrained in a helicopter for 5-10 minutes the food and water requirements (outlined in section 3) would logically be extraneous - compared to the potentially significant amount of time that goats may be tethered for on a roadside.	needs catered for by the handlers that accompany them. No time boundaries have been set.
	408	Make it illegal to tether a goat for more than one day. It is not acceptable for a goat, a very social animal, to be forced to live its life tethered, alone and unable to escape danger.	Additional requirements have been placed around tethering to ensure that goats have their needs met. The importance of social companionship is outlined in a RBP and in the general information.
	512	They are left for days at a time to eat dusty roadside grass.	Noted. Additional requirements have been placed around tethering.
	496	There is nothing sadder than seeing a goat chained to a post or small shelter year after year.	Noted.
	18, 426, 105	Tethered goats are usually provided with inadequate shelter which is very different from the shelter they would seek for themselves in the wild. They are thin-skinned animals.	Additional requirements have been added – including the requirement to provide constant access to shelter for tethered goats.
	442	Asks for a complete ban on tethering. Has seen sad looking goats tethered to roadside, often wet and miserable with inadequate housing. Once wet,	Additional requirements have

		they can succumb to hypothermia and die, especially if wet weather is accompanied by driving wind. Tethered goats become targets for teasing and have no means of escape.	been added – including the requirement to provide constant access to shelter for tethered goats.
	90, 426, 105	Tethered goats are usually provided with inadequate water.	Additional requirements have been added – including the requirement to provide constant access to water for tethered goats.
	418	Food and water will become contaminated by passing vehicles.	Noted. Water must be palatable – MS3 and 7. Food must be provided in sufficient amounts – and therefore must be palatable.
	320	Water requirements are not reflected in the MS.	Noted. Requirements added to MS.
	65, 270, 418, 421, 496, 521,	Goats are being denied the ability to <u>display normal patterns of behaviour</u>	Additional requirements have been placed around the tethering of goats to ensure that when tethering, the practice meets the requirements of the AWA.

	18	Goats are being denied the ability to <u>display normal patterns of behaviour</u> , and sadly it is often for the term of the goat's natural life.	Additional requirements have been placed around the tethering of goats to ensure that when tethering, the practice meets the requirements of the AWA.
	174, 189, 206, 473, 520, 105, 192	Tethering makes it impossible for goats to express normal behaviour as required by the AWA.	Additional requirements have been placed around the tethering of goats to ensure that when tethering, the practice meets the requirements of the AWA.
	279, 300	Goats can become entangled – tethering goes against everything that the Code stands for	Equipment for restraining must be such that it causes no pain or injury to the goat.
	403	Goats can become entangled and strangle themselves to death.	Equipment for restraining must be such that it causes no pain or injury to the goat.
	471	Goats can become entangled and be unable to reach water, food or shelter	Equipment for restraining must be such that it causes no pain or injury to the

			goat. Additional requirements added that goats have constant access to water, food and shelter.
	3	<p>Support banning roadside tethering of goats.</p> <ul style="list-style-type: none"> <li>• Very often no water provided.</li> <li>• Very poor grass/gorse/scrub quality.</li> <li>• Inadequate housing provided.</li> <li>• Goats are tethered on very busy roads which may be frightening to the animals.</li> <li>• Cruelty to goats by passers-by.</li> <li>• Goats get caught up in branches or bushes, and are left like this for days are owners do not check them often enough.</li> </ul> <p>Goats are herd animals and to be tethered by a chain to a line or a fence is unforgivable to any animal and deprives them of a herd environment.</p>	Additional requirements added so that goats have their needs met.
	4	<p>Submission opposes points raised in this section of the Code.</p> <ul style="list-style-type: none"> <li>• Roadside tethering of goats is cruel and out of date.</li> <li>• Roadside growth can be controlled by other methods such as weedspray.</li> <li>• Goats stuck on the roadside are not able to life in a normal way.</li> <li>• Many goats are subject to cruelty due to easy access.</li> <li>• They need company.</li> <li>• They often live in awkward slopes without shelter.</li> </ul> <p>Believes roadside tethering to be a dangerous distraction for drivers.</p>	Additional requirements added around the tethering of goats.
	18	<p>According to the SPCA goats are fussy eaters and when being tethered they have no choice by to eat what is around them. A lot of people still believe that goats do not drink and hence do not provide water or leave them with small amounts of dirty water. Is surprised that there are not</p>	Noted. Tethered goats must have their food and water needs met. Additional

		more accidents involving goats tethered on the side of the road.	requirements have been placed around the tethering of goats.
	57	<p>Tethered goats are the cause of frequent complaints to the SPCA to deal with the following issues</p> <ol style="list-style-type: none"> <li>1. Poor housing that is neither water ore draught proof</li> <li>2. No water provided</li> <li>3. No shade nor shelter</li> <li>4. Poor quality feed</li> <li>5. Goat not moved frequently enough</li> <li>6. Goat has high worm burden due to being on a small area of grazing</li> <li>7. Body condition poor because goat cannot browse (its preferred way of eating) and grass quality is poor and/or contaminated by petrol/diesel fumes from road.</li> <li>8. Serious injury because too near road</li> <li>9. Serious injury caused by dogs or cruel passerbys</li> <li>10. Denial of herd instincts. Tethered goats are often lonely and forgotten</li> <li>11. Many tethered goats are ferals brought in after a hunt and are thus highly stressed by the abnormal conditions of tethering.</li> <li>12. Tethered goats do not enjoy the five freedoms enshrined in the AWA 1999.</li> <li>13. Tethered goats are unnecessary because the work they do could be replaced by a lawn mower.</li> </ol> <p>I recommend a complete ban on all tethered goats. There are too many problems associated with tethering. It is impossible for the small numbers of animal welfare inspectors (both MAF and RNZSPCA) in New Zealand to ‘police’ any minimum standards. There should be a phase out time of six months to allow owners of tethered goats to re- home them. Goats are not lawn mowers but they are herd animals and should be cared for as such.</p>	Noted. Additional requirements have been placed around the tethering of goats.
	160	A total ban on tethering is essential. Goats are intelligent social creatures and it is unacceptable to keep the animals tethered in solitary confinement	Noted. Additional requirements have

		(i.e. tethered as a lone goat). This is cruel. Tethered goats are vulnerable to dog and human attack and send a clear message to public that the behavioural requirements and safety of the animal are irrelevant and therefore the positive welfare the AWA is supposed to provide does not apply to goats.	been placed around the tethering of goats.
	176	Is concerned that the draft Code provides for goats to be tethered. This is contrary to the provisions of the ‘Five Freedoms’ as stated in the AWA 1999. Goats are social and like the company of their own kind. Tethered goats are invariably single goats and must suffer isolation and boredom. Tethering cannot give goats sufficient exercise. The SPCA is opposed to all forms of long-term tethering, as it is unnatural for an animal which likes to roam and graze. Tethering leaves goats vulnerable to attack and cruel treatment. The goat has no defence and cannot run away. There have been many horrific incidents of goats being attacked.	Noted. Additional requirements have been placed around the tethering of goats. RBP added to accentuate the social requirements.
	258	Supports banning roadside tethering of goats. In addition to welfare issues, submitter has been attacked twice by goats that got free of their tether and had close calls with goats lying on the road for warmth at night.	Noted.
	270	Goats are certainly not able to express their normal behaviour as highly sociable, browsing, intelligent animals worthy of care and respect. (Relays personal experience with their milking goat.)	Noted. Additional requirements have been placed around the tethering of goats. RBP added to accentuate the social requirements.
	281	Has kept goats as pets for 20years and relays personal experience showing that goats enjoy their freedom and are sociable animals enjoying company of other goats.  Has complained countless times to the SPCA about goats with no water or adequate feed, goats with no shelter and goats regularly entangled in the ropes and chains restraining them.	Additional requirements have been placed around the tethering of goats. RBP added to accentuate the social requirements.
	287	Part of our responsibility towards animals is to ensure animals under our	Noted.

		care are looked after physically and psychologically.	
	312	Has seen goats tethered on very short ropes with no food as they require more than just grass they have browsed over. They are prone to worms and browsing the same area and being forced to eat short grass contributes to this.	Additional requirements have been placed around tethering. Their food requirements must be met.
	319	95% of complaints received about goat welfare are for tethered goats.	Noted.
	353	From experience goats are very social and clever and have an incredible need for company and even call out to each other when they are separated from the herd. Tethering alone on the side of the road is horrific and should be banned. (Reports of incidences of cruelty to tethered goats and near-accident when a goat had wandered out into the road).	The need to provide for the goats social requirements has been included in a RBP and in the general information.
	428	Arrived in NZ 6 years ago and was absolutely horrified to see goats tethered at the roadside. With or without shelter, this practice is abhorrent and many others view it as an outdated and cruel practice. To use an animal as a glorified lawnmower is inexcusable and unacceptable. Goats are social creatures and need to be with other animals. Roadside goats are sometimes attacked, and hit by cars. They often look stressed and are unable to move around properly, which is very upsetting. Tethering alone and on roadsides should be completely banned. Tourists do not want to visit NZ on holiday and leave thinking we are cruel to animals.	Noted.
	465	There should be a complete ban on the tethering of goats. A tethered goat is a helpless, sitting target for those who might have no regard for life and other's wellbeing. In rural and semi-rural areas alike, these goats are usually alone and untended, with no protection and no means of escape in the event of an attack. Not even our farmed grazing animals have such little protection, legally or physically	Additional requirements have been placed around tethering.
	471	Tethered goats are deprived of company, proper exercise and a good diet unless supplemented.	Noted. Additional requirements have been placed around

			tethering.
	475	Tethered goats generally get minimum attention from owners, which can lead to an animal to suffer de-hydration, hunger, hypothermia, hyperthermia and loneliness. The goats are not given the freedom to express their natural behaviour.	Additional requirements have been placed around tethering.
	485	<p>Opposes failure of Code to make long term tethering of goats illegal.</p> <p>1) Goats are highly social animals, which is acknowledged in the draft Code. Tethering precludes social interactions with other goats and therefore contravenes Section 10 of the AWA. Although NAWAC may recommend MS and RBP that do not fully meet the obligations of Section 10, none of the clauses for exceptions appear to be relevant to goat tethering.</p> <p>2) Tethering does indeed not receive much support from the industry either (have supplied web address).</p> <p>3) The draft Code permits goats to be tethered subject to provisions that are prohibitively difficult to verify or enforce. The SPCA can testify that compliance with MS requirements for tethered goats to be ‘inspected every 12 hours.....’ will require an enormous change in goat-keeping behaviour and is not credible.</p> <p>4) Tethering renders goats vulnerable to neglect and ill-treatment. It would be more cost effective for MAF if complaints about tethered goats could be responded to simply by requiring and ensuring that the tethering cease in accordance with the law, rather than by trying to establish whether the proposed MS had been breached.</p>	<p>Noted. The goats social requirements are covered in an RBP and in the general information in this section.</p> <p>Additional requirements have been included around the tethering of goats with the aim of making the risk of neglect of the tethered goat minimal.</p>
	499	Recommended best practice (2.2 animal handling and restraint and 2.4 mixing goats) clearly state that goats have social requirements and should not be isolated. It seems that this cannot be achieved by tethered goats alone at roadsides and, while this is common practice, it appears to be a miserable existence for them. Is also unhappy with the risk of entanglement through being constantly chained. Could a date be set by	Noted.

		which any public education could be instigated and this practice could be banned?	
	511	Tethering goats along roadside verges should be made illegal. Goats are intelligent and gregarious animals and should not be kept in isolation, especially in a tethered situation. The use of goats as cheap lawnmowers is inhumane and goats have been subject to attack by dogs or humans. Why, if the Code states that goats should not be tethered as they are social animals the draft feels it necessary to ignore all the available evidence and allow goats to be tethered in order to keep areas grazed and free of weeds. It is also of concern that goats are able to be hobbled further or subject to tripod collars that allow for the animal to become entangled with potentially fatal consequences. If goats should be allowed to be tethered the use of hobbles and/or tripod collars should be made illegal.	Noted.
	523	Section 2.5 is completely inadequate and illogical. While recommending that goats should not be tethered at all, the minimum standard legitimised the practice of using tethered goats as lawnmowers.  The keeping of goats on roadside verges prevents expression of normal behaviour, including browsing, exercise and companionship, and therefore contravenes the AWA. Tethered goats are subject to torment by dogs and cruel people. As gregarious animals, tethered goats suffer from isolation, confinement and neglect. Roadside goats suffer from poor diet and lack of roughage. Tethered goats are a disturbing sight on our country roads and damage NZ's reputation.	An RBP states that goats should not be tethered as they are social animals. A minimum standard includes details on how goats must be tethered if this practice is performed.
	544	Is concerned about the plight of goats tethered by the roadside. The dangers they face are poor diet, marauding dogs, injury from cars, deliberate cruelty from humans, insufficient water supply, inadequate shelter from inclement weather, not to mention unremitting boredom and social isolation. Would like to see goats so tethered, done so by of aerial running-wires (not ground ones) as a minimum standard, not best practice. The Code does not stipulate the shelter they get be other than	The minimum standards state the very minimum that goats require to maintain their health and welfare. Additional minimum

		<p>'adequate'. Believes roadside goats need permanent man-made structures, of the following design, regardless of whatever natural shelter is available.</p> <ol style="list-style-type: none"> <li>1) Houses should be as long and as wide as the goat is long (i.e. 1m long goat needs a 1m wide and 1m long house). The house should be as high as the goat plus 15-20cm.</li> <li>2) The floor must be flat, uniform and non-slip (no slats). Drainage holes in the floor should be drilled with a maximum diameter of 1cm.</li> <li>3) The roof should be quite pitched (~50degrees) to allow some escape from an attacking dog.</li> <li>4) The entrance should be large enough to enable the goat to enter without bending down to do so.</li> <li>5) There should be a maximum period for tethering, after which the goat should be spelled away from the road, preferably free and preferably with conspecifics, before being returned to the roadside.</li> </ol> <p>Has often driven past sizable goat tied by the road with no natural shelter, no sign of water and a 44 gallon drum lying on it's side, the opening of which would necessitate the goat getting down on all fours to enter it, and no way of turning around once in. Such a 'shelter' is useless to the goat.</p>	<p>requirements food constant food, water and shelter have been added around tethering. An RBP has been added to say that an aerial line should be used.</p>
	545	<p>Over the past 4 years complaints (i.e. notification of injured, neglected or abused animals) included 317/11,644 complaints (2006), 315/11,614 (2007), 408/13,559 (2008) and 363/13,021 (2009). This means goats are the sixth most notified animal. In rural areas such as Waikato goats make up a significant part of the rural work load for auxiliary officers and inspectors. The majority of these complaints involve solitary tethered goats notified to us by public as they are seen on road verges.</p> <p>The very nature of tethering solitary goats is in contravention of the AWA 1999. Goats are social herd animals, as stated in the Code itself. As such, solitary tethering denies goats their freedom of expression of instinctive</p>	<p>Additional requirements have been placed around tethering. Their social requirements have been included as an RBP and in the general information.</p>

		<p>behaviour. Tethered goats are also allowed by this Code to be further restricted by hobbling and/or tripod collars. These devices lead to the animal becoming entangled with potential for dehydration, starvation and strangulation. There is further peril for tethered goats from attack by dogs and through their proximity to the road. As the purpose of tethering is to provide a cheap ‘lawn mower’ and only trivially affecting the financial circumstances of the owner, the practice should not be allowed to continue.</p> <p>Should be amended to read:</p> <ul style="list-style-type: none"> <li>a) Goats must not be tethered on a roadside or similar area.</li> <li>b) Goats that are restrained by tether must be placid and be trained to the conditions.</li> <li>c) Goats that are tethered must have access to appropriate weather proof shelter at all times.</li> <li>d) Goats that are tethered must be inspected at least once every 12 hours and appropriate action taken if the tether is tangled or there any other cause for distress.</li> </ul> <p>Goats that are tethered must not be hobbles or have tripod collars applied.</p>	
	2	<ul style="list-style-type: none"> <li>a) ‘<u>Goats that are restrained must be placid</u>’: These words should be changed to something like “Owners/handlers must ensure that only goats that are placid and trained to the conditions are tethered.”</li> <li>b) “Adequate” should be inserted in front of “shelter,” and an explanation of what this means should be added to the example indicators.</li> <li>c) How long does it take for a tethered goat to get tangled up and possibly choke to death? To be attacked by a dog? To be attacked by humans? Perhaps if the owner/handler were required to inspect the goat every 3 hours, tethering might seem a less attractive practice.</li> </ul>	<p>Additional requirements have been added including the requirement that goats must be trained to the conditions, effective shelter must be provided, equipment used so that it does not cause stress or injury.</p>

		<p>d) There are contradictions in terms here. Vehicles routinely go onto roadside verges to park, to pull over to look at the map or answer a call on the mobile, to swerve to avoid oncoming traffic or wildlife, to deliberately maim, kill, or steal goats that cannot escape etc. If our aim is to keep goats out of the path of vehicles, the last thing we should do is to legalise the roadside tethering of these animals. If tethering is to be allowed, it should not be on public land, and certainly not within centimeters of traffic. Minimum Standard No. 4 (d) should be changed to: “Tethering of goats is not permitted outside boundary fences.”</p> <p><b>Omission: Provision of food and water.</b> The obligation on the owner/handler to provide food and water must be added to the Minimum Standards – it gets a mention in the example indicators.</p> <p><b>Omission: Reference to tripod collars and hobbles.</b> These restraining methods are mentioned under <i>Recommended Best Practice</i>. The sentence under that heading ought to be strengthened, grammatically corrected, and made a Minimum Standard: <b><i>Tripod collars and hobbles must not be used to limit the ability of goats to move.</i></b></p> <p><b>Omission: The need for goats to be provided with one or more companions.</b> Assuming tethering is to be allowed, this should be made a Minimum Standard: “Goats must not be tethered on their own, but in pairs or in groups of three or more.”</p> <p><b>1.</b> In other words, these intelligent, freedom-loving animals have been tricked into accepting a solitary and highly dangerous captivity from which there is no escape. So yes, the example indicator reflects the current ill-advised Minimum standard.</p>	<p>NAWAC considers that goats within a boundary fence are at the same risk as those outside.</p> <p>Agree. Added.</p> <p>Disagree. Left as RBP.</p> <p>That a social companion should be provided has been included as an RBP.</p> <p>Noted.</p> <p>Noted.</p>
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		<p><b>2.</b> So why is this requirement not set out in the Minimum Standard in the same way that shelter is?</p> <p><b>3.</b> There are contradictions in terms here. It is impossible to come up with a example indicator for (d): if a goat is on the roadside verge, she is, by definition, in the path of vehicles.</p> <p><b>Omission: Example indicator for MS 4b.</b> There ought to be an example indicator that sets out the minimum requirements for the shelter. This should spell out the need to provide effective cover and shade at all times, regardless of wind direction, and to provide enough room for the goat to be able to lie down and rest.</p> <p>a) Promote the Recommended Best Practice to a Minimum Standard.</p> <p>b) Sentence should be strengthened, grammatically corrected, and made a Minimum Standard: <i>Tripod collars and hobbles must not be used to limit the ability of goats to move.</i></p>	<p>Noted.</p> <p>Agree. ‘Effective shelter’ has been included in the MS.</p> <p>Disagree.</p> <p>Disagree.</p>
	320	<p>Given previous comment about the social nature of goats, suggest there is need to address this further for tethered goats. Perhaps tethered in pairs or in sight of other domestic animals?</p> <p>c) Delete ‘once every 12 hours’ and replace with ‘twice daily’.</p> <p>Add the following clauses:</p> <p>e) Goats must have access to water at all times [not strong enough to just mention it in the example indicators].</p> <p>f) Goats must be tethered in such places where they are not at risk of attack by dogs.</p>	<p>Additional information about the social requirements of goats has been added. Disagree.</p> <p>MS requirements have been added regarding constant access to water and food.</p>

		<p>g) Suggest a m/s about provision of food – it is not sufficient just to mention as an example indicator.</p> <p>The general requirement for shelter is repeated here as a MS.</p>	<p>Disagree re f). NAWAC considers that goats are no more at risk in any particular locations.</p>
	511	<p>Should be amended to read:</p> <ul style="list-style-type: none"> <li>a) Goats must not be tethered on a roadside or similar area.</li> <li>b) Goats that are restrained by tether must be placid and be trained to the conditions.</li> <li>c) Goats that are tethered must have access to appropriate weather poof shelter at all times.</li> <li>d) Goats that are tethered must be inspected at least once every 12 hours and appropriate action taken if the tether is tangled or there is any other cause for distress.</li> </ul> <p>Goats that are tethered must not be hobbled or have tripod collars applied.</p>	<p>Additional requirements have been placed around the tethering of goats.</p>
	523	<ul style="list-style-type: none"> <li>a) The requirement that goats should be ‘trained to the conditions’ would be laughable if it were not so abhorrent. This standard allows anyone to legally tether a roadside goat until its spirit is broken and it is used to traffic, noise, pollution and a life of misery.</li> <li>c) The requirement that a tethered goat must be inspected at least once every 12 hours is unenforceable.</li> <li>d) The requirement that the tether be short enough to prevent the goat from stepping onto the road is nothing more than commonsense and does not even amount to a minimum standard. On the contrary, this requirement makes it lawful to restrain a goat on the shortest possible tether in the cruellest possible manner.</li> </ul>	<p>Noted.</p>
	547	<ul style="list-style-type: none"> <li>(b) Goats that are tethered must have access to a suitable shelter that is of a sufficient size for the goat to access, and enable the goat to get out of the wind and rain/or heat at all times.</li> </ul> <p>The form of tethering must ensure that the goat will not suffer from sores</p>	<p>MS states that goat must have access to ‘effective shelter’. The equipment used for restraint of goats must</p>

		<p>nor rubbing from the restraint. The tether should not be able to become tangled.</p> <p>The goat must have the ability to get off any wet ground (unlike many stock, goats cannot tolerate wet feet).</p>	<p>be fit for purpose and avoid stress or risk of injury.</p>
	2	<p>The draft Code spells out an actual need that goats have: “Goats are social animals and <u>need</u> to be provided with one or more companion.” In other words, companionship is not a wish or a best practice – it is a need. Consequently, common sense dictates that this also be included in the Minimum Standards. It thus follows, assuming tethering is allowed, goats must not be tethered on their own, but in twos or threes.</p>	<p>RBP and general information reflects this need. NAWAC consider that it is not a minimum standard.</p>
	41	<p>Goats social needs can be adequately met as a pet, particularly when so raised in a human environment from early age. Our wide experience has been that tethered ‘humanised’ goats get adequate social contact from owners and passers-by. Otherwise they would not live happily for, in one case, 17 years old. Sole goats can also socialize with other animals (horses, bulls).</p>	<p>Agree. Information added to state that other animals can act as companions for goats.</p>
<b>3. Feed and Water</b>			
<i>General comments</i>	2	<p>Supports section in its entirety.</p>	<p>Noted.</p>
3.1			
<i>General comments</i>	1	<p>Under the feeding section it might be worth suggesting that owners have access to a backup feed supply, especially for new animals and in times of drought. Leaves from any fruit tree provide a safe backup food source although some natives need to be avoided too (eg. Ngaio). There is a good website which provides information on the recommended balance between dry and green food sources for different types of animals which is especially important for goats as they are much less tolerant than sheep.</p>	<p>Noted. But text in this section has been cut to minimum as NAWAC considers that codes should not be a ‘how to farm’ document.</p>
	41	<ul style="list-style-type: none"> <li>• Add weed and production systems as qualifiers for feeding needs.</li> <li>• Plants include pasture and weeds (as well as browse)</li> <li>• If education is important in the Code, goats have a wider dietary range than sheep and cattle. Feed quality and quantity are more than pasture and should include all plants eaten.</li> </ul>	<p>Information has been included re pasture and weeds.</p>

		<ul style="list-style-type: none"> <li>Consistency between “herd” and “flock” is needed. Dairy goat farmers are unlikely to accept flock. Herd is probably more universally acceptable.</li> </ul>	Agree. The term ‘herd’ is now used throughout document.
	194	<p>If goats are fed on oats for months or years their bodies cannot adapt to sudden changes of diet, including back to pasture. Goats need pasture and plenty of roughage, grasses and even tussock.</p>	Information is included in text that pasture and browse are the main source of feed and changes to diet need to be made gradually.
<i>MS #5</i>	511	<p>Animals defined as ‘thin’ in the applicable body scoring chart should receive immediate attention to remedy the problem.</p> <p>MS #5 subsection a and b should be amended and read:</p> <p>a) Goats of all ages must receive sufficient quantities of food and nutrients to enable each animal to:</p> <ul style="list-style-type: none"> <li>(i) maintain good health;</li> <li>(ii) meet physiological requirements;</li> <li>(iii) maintain appropriate body condition; and</li> <li>(iv) minimise metabolic and nutritional disorders.</li> </ul> <p>b) If any goat shows signs of weight loss or, if the body condition of any individual goat falls below 3 (on a scale of 0-5) that animal must receive appropriate remedial action through improved nutrition, husbandry practices or veterinary attention.</p>	Disagree.
<i>Example indicator MS #5</i>	320	Point 2: Acceptable to what or whom?	Text modified for clarity.
	511	Point 1 should be a minimum standard.	Disagree.
<i>General information</i>	320	Second paragraph, text in brackets: delete e.g. <i>segregating animals or</i>	Disagree.
3.2			
<i>General comments</i>	41	Roadside goats shifted regularly and/or on a running tether can usually	But not appropriate for

		have access to adequate moisture in their plant food (attached Kilgour reference)	a CoW. Daily access to water must be provided.
	194	Water must be fresh, running water with no chlorine, fluoride and so forth.	Agree. Water must be palatable – as stated.
	294	There is an anomaly in the standard, example indicator and best practice in relation to the maximum time that goats should be kept in yards and barns without water. These clauses should be consistent and suggest that 6 hours is the absolute minimum time. The period of 12 hours in MS #6 (d) and bullet point 5 in Example indicators should be changed to 6 hours in both instances.	Disagree. These times are to reflect the minimum standards and RBP.
<i>MS # 6</i>	41	Daily access ignores the information presented by Kilgour (see attached reference) and the fact that goats in many parts of the world live, produce and perform optimally without daily access to water. Suggest to replace <i>daily</i> with <i>adequate</i> as in (a), and delete <i>daily</i> in (b) and (c).	But not appropriate for a CoW. Daily access to water must be provided.
	499	d) MS suggests that goats can be without access to water for up to 12 hours, yet the best practice/general info states that there should be access at least 6 hourly and that 9L/head/day should be allowed per goat. There seems to be a huge difference between 6 hours and 12 hours (especially for high summer or different feed types perhaps). Should reconsider the adequacy of the minimum standard of 12 hours without water.	Disagree.
	547	(d) Any goats retained in yards or barns for longer than 12 hours must have access to drinking water.  12 hours is far too long for a goat to be without water on a hot day, and would constitute extreme cruelty for a lactating doe or kid. This should be reduced down to say water availability at all times, unless being transported. Then if lactating does or kids, every 2 hours, 6 hours max if not lactating does or kids.	Disagree. This is MS – the RBP states every 6 hrs.
<i>Example indicators MS #6</i>	320	Point 2: Is this practical and likely?	Disagree. Remains in text.
<i>RBP</i>	320	d) Is there a reason why 6 hours as compared to 12 hours in the MS?	Its an RBP – not MS.

<i>General information</i>	320	Second paragraph: ‘ <i>When planning water for dairy goats, ensure that the reticulation system can provide 9L/head/day</i> ’. This should be a minimum standard.	Disagree. Outcome based MS – this is more appropriate as EI.
<b>4. Shelter and Housing Facilities</b>			
<i>General comments</i>	1	A reference to responsibilities for fencing would be useful.	Disagree. This is not animal welfare issue per se
	2	Supports section in its entirety.	Noted.
	41	List of bullet points page 19: Reorder – Newly shorn goats – especially feral, cashmere bearing goats	Agree. Text changed
	469	Suggests the following minimum requirement for accomodation of all farmed goats: <ol style="list-style-type: none"> <li>1) All stock shall be contained within paddocks of sufficient size that the drainage and vegetation recovery can maintain at least 50% of the area as dry under foot.</li> <li>2) The paddocks shall contain at least one shed with an open side facing away from the prevailing frontal weather, and is of sufficient size to provide shelter to all the stock contained in the paddock.</li> <li>3) The shed shall be maintained with dry straw, clean water and supplementary feed.</li> <li>4) All stock shall have free access to the shed, day and night.</li> <li>5) The paddock shall be maintained with a variety of vegetation including established trees that provide partial shade over at least 20% of its area.</li> </ol>	Disagree.
4.1			
<i>General comments</i>	38	Adequate shelter, in a fully fenced paddock, must be provided for all goats.	Disagree. But requirements for adequate shelter outlined.
	281	Is amazed that farmers keeping goats often do not know that goats do not	Noted. And information included in CoW to this

		have oil in their coats to repel water as sheep do and therefore get cold very quickly when wet.	effect.
	319	Needs a reasonable definition of ‘adequate shelter’ for tethered goats. Something like ‘topographical features like caves, overhangs, gullies or hollows’ does not cover tethered goats. Dogs must have adequate shelter (e.g. a kennel), therefore goats must have a similar and defined shelter.	Disagree.
	320	Repetition!	Noted.
	475	There is no measurement of what a minimum shelter is. Shelter should not be limited to natural windbreaks, hedges or trees. Shelter should be a building such as a shed that has a roof and walls on three sides to protect the goats from harsh weather conditions. The goats should be free to go to the shelter when they feel the need. Inside, the shelter should have sufficient bedding.	Disagree. But the shelter is required to be effective.
	511	All goats must have access to adequate shelter at all times. If no minimum standard is in place in the final Code whereby owners and/or persons in charge of goats are obligated to provide shelter for their animal/s at all times, large numbers of goats may suffer unnecessarily.	Agree. MS included to this effect.
<i>Introduction</i>	320	Last sentence of Introduction ( <i>While it is neither possible....plans for likely extreme events.</i> ) This should be a recommended best practice although already covered to a certain extent within the recommended best practices, in which case delete?	Agree – information to this effect is included as an RBP.
<i>MS #7</i>	281	The word ‘shelter’ in each section should be preceded by the word ‘weatherproof’.	Disagree.
	485	Shelter from heat should be a requirement of MS 7.	Agree. Text modified.
	511	The use of the phrase ‘topographical features’ is of concern when applying it to the provision of shelter. The minimum standard must be strengthened so it is clear to operators that any shelter that is provided is effective in its purpose and not merely an afterthought. A clear definition of ‘adequate shelter’ assists greatly in the maintenance of the law.  Subsection (a) should be amended to read: a) All goats must have access to adequate shelter that is weatherproof at al	Disagree.

		times.  The term ‘adequate shelter’ should be defined in appendix 3.	
	547	Most goat breeds cannot cope with getting wet, nor tolerate having wet feet. Heat or cold are often lesser problems, especially depending on goat breed. It needs to be stated here that goats must have the ability to get out of the rain, get off wet ground, and to get out of the wind.  Also, dominant goats will evict weaker goats from a shelter, so there needs to be allowance made so that weaker goats can also access shelter	Agree. This information has been included in the introduction in this section.
<i>Example indicators MS #7</i>	41	Planning for shearing...until the fleece has regrown <i>sufficiently</i> .	Agree. Text modified.
<i>Recommended best practice</i>	281	The shelter examples given should only apply in moderate conditions. Rocky overhangs may well provide adequate protection from rain but most goat farms are unlikely to have such features. Shelter belts do not prevent animals from getting wet or keep out draughts. Therefore, shelters and sheds that goats have free access to are a must, catering in the process for those at the bottom of the hierarchy which are unable to compete for a place. Such structures should be sited in the middle of the total pasture with a set of yards and gates so that access can be gained from any paddock. Milking facilities for dairy goats could adjoin such structures.	As stated in the CoW, shelter must be effective.
	294	Proposals included in clauses e and f support the notion that the experienced practitioner provides the most suitable training on today’s goat farm. Strongly support recommendation to ‘ask for assistance’ and urge its retention. Suggest that local or national (breed) goat organisations are worth listing as a source of assistance and should be included in this list.  e) Alter wording to read: ‘...ask for assistance, if needed, from local regional authorities, Federated Farmers <i>Goats</i> , <i>local or national goat organisations</i> , farm management professionals or the farm veterinarian.’	Agree. Reference made to goat associations on managing emergency response plans.

		<p>The reference to Meat and Wool NZ is inappropriate in that 1) it is in the process of a name change and 2) following the levy referendum this organisation is no longer involved with goat farming.</p> <p>f) Alter wording to read: ‘...ask for assistance, if needed, from Federated Farmers Goats, local or national goat organisations, industry organisations such as MAF, farm management professionals or the farm veterinarian.’</p>	<p>Agree. Text removed.</p> <p>Text modified to reflect local or national goat associations can be contacted.</p>
<i>General information</i>	41	The main problems with covers are that horned goats get tangled in other goats’ covers.	Agree. Text added.
4.2			
<i>General comments</i>	294	Strongly advocate national fencing minimum standard. An adequate fence is quite able to hold the modern domestic goat thereby contributing to its welfare by protecting it from various dangers. The existence of a single standard would be more efficient than many standards applied by different regional councils as appears to be advocated in the Code. Recommend a standard accepted by the Environment Court (Western Bay of Plenty District Plan case) and has since been accepted by some other Councils and Conservancies. Recommend its inclusion in this document as a country-wide standard.	This is not related to animal welfare per se – not relevant for inclusion in the CoW.
<i>Example indicators MS #8</i>	320	Point 3: Surfaces can’t be slippery because the MS says the floor must be a non-slip material.	Disagree. This is EI.
<i>RBP</i>	41	b) The wording could be interpreted that farms with large gauge netting should not run goats. That is discriminatory and commercially impracticable. If nothing else, an electrified outrigger will prevent access to a netting fence. It is almost universal that it is only a very few specific goats that get entangled by their horns in netting, and they can be suitably treated/ Suggest rewording as ‘ <i>all fences to control goats should be adequately constructed to avoid unnecessary distress</i> ’.	This is RBP only.
<i>General information</i>	294	Alter last sentence to read: ‘ <i>Information on fencing standards is contained</i>	Disagree.

		<i>in Appendix VI of this Code.</i> The reference to Meat and Wool NZ is inappropriate in that 1) it is in the process of a name change and 2) following the levy referendum this organisation is no longer involved with goat farming.	Agree. Reference to Meat and Wool removed.
4.3			
<i>General comments</i>	5	Strongly opposes any and all permanent indoor housing of animals, as it is not natural. An animal needs to allowed to exhibit 100% normal behavior.	Disagree.
	25	No factory farming of goats.	Noted.
	38	Goats should not be allowed to be intensively farmed indoors and should be allowed to feel grass beneath their feet in a normal habitat.	Noted.
	125	Any farmed goat, especially intensively reared, should have plenty of room to lie down, walk around and exhibit normal behaviours. Intensive farming of goats seems incredibly cruel and unnecessary.	Noted.
	160	If goats are to be intensively farmed in indoor housing, the animals must have enrichment. Goats are by nature inquisitive, intelligent and playful. They must therefore have <ol style="list-style-type: none"> <li>1) enough feeding space to avoid competition</li> <li>2) enrichment so that they are occupied (they are not brainless machines, they need to be occupied to avoid feeling stresses which cause them to react by fighting, competing for food, etc)</li> <li>3) space for each animal to lie down; to be able to get away from other goats (especially important for subordinate goats)</li> <li>4) goats form friends and/or groups, mixing of unfamiliar goats can exacerbate stresses within the group and cause fighting. Thus avoid mixing unfamiliar goats/herds.</li> </ol>	These issues are addressed in the section and the requirement for animals to be managed in a way that ensures their welfare is accentuated.
	192	Goats housed indoors must be given sufficient space, enrichment areas that include resting areas that allow goats, including subordinate ones, to feed drink and lie down.	These aspects are addressed in this section.
	194	Opposed to factory farming of goats. They need freedom from factory – farming, as they need pasture, fresh air and sunshine. Allow barn doors to be open so they can come in from the cold of their own free will or to go outside.	Noted.

	270	Was not aware that goats are housed indoors in NZ and considers this a most unnatural state, certainly preventing their natural browsing behaviour.	Noted.
	281	Loafing barns where goats are kept indoors all the time are a breach of the AWA as they do not permit the full range of natural behaviours such as foraging and moving over a wide area out in the fresh air. Rather than subjecting these animals to an unnatural life, farmers should be encouraged to step outside their straight line of thinking and learn about other ways to counteract worm infestations.	Noted. NAWAC considers that they can be held indoors in a manner that meets the requirements of the AWA.
	287	Any animal kept inside needs space. Especially one that is a natural wanderer. Allow goats locked inside some dignity and give them space.	Noted.
	408	Whether goats are kept outside or in sheds they should be provided with lots of room, shelter, and a variety of stimulus, so they can eat, drink, rest and play in a way that allows them to be healthy and content.	Noted.
	413	There should be adequate space in goat housing to allow them to socialise and access feed and water without undue stress. Herd dynamics should be considered when grouping goats as horned ones can bully de-horned ones and care should be taken when splitting groups or introducing new goats to minimise stress.	Space requirements and herd dynamics are covered in the introduction. RBP added on mixing goats.
	414	Would like to see a total ban of raising goats in sheds. If goats are to be continued to be raised in sheds, would like to see a very decent amount of space given to each one, and healthy nutritious food that they enjoy along with living circumstances that replicate their natural habitat.	Noted.
	446	Goats should not be kept indoors their whole lives, which is unnatural and cruel.	Noted.
	453	Space per goat should be larger.	The suggested space allowance is in accordance with normal practice. RPB recommends additional space.

	465	Indoor housing is neither natural nor fair to the animals. Enough space is needed for freedom of movement and recreation. Herds should be kept small for less stressful social interaction.	Noted.
	497	Support free range for goats with the provision of varied and interesting space and access to shelter when they chose it.	Noted.
	511	Strongly oppose any type of intensive farming whereby animals are habitually confined to unnatural environs and are thus opposed to confinement of dairy goats to loafing barns full-time.  Any relevant Code must mandate strict measures as to the control of the environment in which animals are confined. All the example indicators as well as most of the recommended best practice points should be included in the minimum standard. Realise that this request is unrealistic so would focus on key points. The following should thus be minimum standards: 'Goats are inspected at least once a day in the housing area for signs of discomfort or distress due to environmental factors' and 'Where thermal stress occurs it is immediately remedied'. The same applies to the recommended best practice points c, d, e, f, g and m; all of which require the most minimum husbandry standards.  Enrichment devices must be used where possible in order to reduce boredom and stress and each animal in the herd must have access to clean dry bedding material.	Noted.  Agree – minimum standards to this effect have been added.  An RBP has been included about environmental enrichment and an EI about bedding materials.
<i>MS #9</i>	499	Minimum levels of ammonia are suggested but it is not stated whether people are expected to measure these levels. It may help to state the circumstances (frequency, size of operation, existing ventilation, stench?) under which people are expected to monitor levels. Should this be done by a specialist?	An indication of ammonia levels has been included in the GI.
	511	Additional clauses to be added:	Disagree.

		<p>e) Goats must be inspected at least twice a day in the housing area for signs of discomfort or distress due to environmental factors (e.g. runny noses or eyes as a result of build-up of ammonia) and any problems rectified.</p> <p>f) Where any individual goat is identified as suffering from thermal stress remedial action must be taken.</p> <p>g) Feeding and watering systems must be constructed to be readily accessible, prevent competition and take into account the feed, stock type and size of the enclosure.</p> <p>h) The bedding area must be dry and covered with material to provide a comfortable resting surface.</p> <p>i) A minimum space allowance of 3 m<sup>2</sup> per mature goat must be provided to reduce the chance that underfoot conditions become wet.</p> <p>j) Bedding must not contain toxic chemicals e.g. timber preservatives or other materials that might poison animals or cause skin irritation e.g. Rimu sawdust (which is very irritating to skin)</p> <p>k) Environmental enrichment practices, which do not increase the risk of injury to goats, must be used where possible.</p>	
<i>Example indicators MS #9</i>	320	Point 2: This is already a MS.	Agree. Text modified for clarity.
<i>RBP</i>	499	j) 50lux is a very low light level (not suitable for reading). There is no mention of access to natural light for goats housed indoors and suggest that this be reviewed.	Disagree.
	41	a) This is unnecessary. It is a resource consent matter anyway.	Agree. Removed
<i>General information</i>	320	<p>First sentence of third paragraph ('Signs of bullying...'): This sentence repeats the first example indicator.</p> <p>Last sentence ('Emergency contingency...'): Should be recommended best practice.</p>	<p>Disagree. These are EI and GI.</p> <p>Disagree. But moved to example indicator.</p>
<b>5. Husbandry Practices</b>			
<i>General comments</i>	2	Supports section in its entirety.	Noted.

5.1			
<i>General comments</i>	511	<p>Birth process is a critical time for any animal and all owners and operators in charge of kidding does should be fully knowledgeable and trained as to the potential problems that may arise and have sufficient skills and equipment to remedy them. Farming operators should have plans and procedures in place for the kidding process and these plans and procedures should be analysed and updated where necessary, as a matter of basic minimum standards.</p> <p>Any minimum standard instructing owners or persons in charge to seek veterinary advice, or humanely destroy the animal, to include a time frame for this to happen. When there is a possible breach of the AWA problems can be encountered when ambiguous wording in the minimum standards is used as a defence to an alleged offence.</p>	Minimum Standards are outcome based – owners must take prompt remedial action.
<i>MS #10</i>	41	a) Inspection at least twice every 24 hours might suit dairy goats, but would cause more harm than good to free-ranging commercial goats at pasture, often with a concentrated kidding pattern. That is in fact recognised in the Introduction wording, so (a) is inconsistent. Suggest inserting ' <i>intensively managed</i> ' at the start of sentence (a).	Agree. Text changed.
	320	a) The third example indicator point indicates that this requirement applies only to intensively farmed goats and is generally inappropriate in extensive situations given the potential disturbance to the birthing process plus the possibility of mismothering.	Agree. Text changed in MS.
	511	<p>Amend to read:</p> <p>c) If any doe is having difficulty kidding and the stock handler is unable to resolve the problem, expert advice must be obtained immediately or the animal humanely destroyed.</p> <p>Additional clauses:</p> <p>d) Farm routines must show that inspections occur at least twice every 24 hours in intensive farming situations, that inspection results are analysed and necessary changes are incorporated into future planning</p>	<p>Disagree. But text modified.</p> <p>Disagree.</p>

		<p>e) Stock handlers must have knowledge of kidding problems and how to correct them and have appropriate equipment to use when assisting kidding does.</p> <p>f) Stock handlers must be knowledgeable in how to obtain expert advice, and such advice is sought when required.</p>	
	547	Problems occur at least as frequently within 48 hours after kidding as before or during kidding, so part of the MS here should include a requirement for frequent post kidding checks. The Code appears to be catering only for commercial herds. For non-commercial goat herds it would be better to say that a veterinarian must be called if labour has been for a greater than ?? length of time (?? Detail on this length of time should be supplied by a veterinarian).	<p>Agree. Text modified to inspect post-kidding.</p> <p>Time frame stated in RBP.</p>
5.2			
<i>General comments</i>	25	The weaning of goats at too early an age should be banned for maximum health and wellbeing of the animals.	Recommended age of weaning included in RBP.
	38	Kids must not be separated from their mothers until they are at least 8 weeks of age, because until that age they are dependent on their mother's milk.	Included as a RBP.
	192	<p>Kids must not be separated from their mother for at least six to seven weeks, until they become less dependent on mother's milk.</p> <p>Horned and non-horned goats must not be reared together.</p>	Included as a RBP.
	194	Kids not to be separated until they become less dependent on mother's milk.	Included as RBP.
	320	<p>Delete full stop after first and last point.</p> <p>Point 3: The third example indicator point indicates that this requirement applies only to intensively farmed goats and is generally inappropriate in extensive situations given the potential disturbance to the birthing process plus the possibility of mismothering.</p>	<p>Agree. Removed.</p> <p>Disagree. Is relevant to all situations.</p>
	408	Would like it made a requirement that kids be left with their mothers for a minimum of two months, the crucial period of suckling and bonding.	Included as a RBP.

	413	Kids should remain with their mothers for at least 6-8 weeks so they can develop in a healthy way with mother's milk.	Included as RBP.
	446	Baby goats should not be deprived of their mother's milk before they are ready (7 weeks is not necessarily long enough). Milk should not be diverted for commercial gain.	Included as RBP.
	453	Does can produce milk for a very long time if milked regularly, even if kids are not weaned until 6-8 weeks, which would be more beneficial to the kids.	Noted.
	465	Offspring should be kept with their mothers for as long as possible to increase their health and psychological wellbeing.	Disagree. At some point separation occurs. RBP states recommended minimum time.
	475	Animals should not be separated from their mothers until they are less dependent on their mother for milk and emotional bonding. This Code should state a minimum of 4-6 weeks.	MS wouldn't apply to orphan kids. RBP states recommended minimum.
	496	There needs to be explicit provision that kids should be kept with their mothers for at least 8 weeks.	Included as RBP.
	511	Agrees with opening paragraph of Introduction section and feel strongly the standard of care involved in caring for newborn kids must be paramount importance in any relevant Code of Welfare due to dependent and vulnerable nature of these animals.  In any commercial operation the requirement for staff to be well trained should be a minimum standard.	Noted.
<i>MS # 11</i>	320	Add the following clause: e) Persons undertaking destruction of kids must be competent in the handling and killing of them.	Covered in MS 19.
	511	Amend to read: d) Every kid must receive colostrum as soon as possible after birth, preferably within the first 6 hours. If it is suspected that a kid has	Disagree. RBP only. MS included that kids must receive

		<p>not received colostrum, then colostrum or a suitable substitute must be given to the kid within 24 hours of birth.</p> <p>Add following clauses:</p> <p>e) Farm staff must be trained in appropriate routines for the humane destruction of kids that must be destroyed.</p> <p>f) Stock handlers must be trained to recognise if a kid is not receiving adequate feed and how to remedy the situation.</p>	<p>sufficient colostrum.</p> <p>Covered in MS19.</p> <p>This is included as an example indicator.</p>
	547	<p>‘Hand-reared kids must be given suitable liquid feeds until the rumen has developed sufficiently to allow it to use solids as the sole feed source.’</p> <p>The minimum number of weeks the kids must be fed milk, the frequency, and the amount needs to be stated here. The most frequent cruelty we have come across is people weaning the kids within a few weeks of birth and the kid either dying or suffering ill effects for the rest of its life. Many people would not know how to gauge whether or not rumen development had progressed sufficiently in a kid, nor know that kids require milk meals 4-5 times a day rather than the once a day that can sustain a calf. Unlike calves, which can be fed milk substitutes, the kids only tolerate goat or lamb milk formula, so the term ‘liquid’ would be better altered to state ‘acceptable forms of milk’ to be clear.</p>	<p>Noted. Guidance information has been included in the text to portray this information.</p>
<i>Example indicators MS #11</i>	320	<p>Remove full stop after first point.</p> <p>Delete <i>e.g. by stomach tube</i> (point 3).</p> <p>Delete <i>appropriate routines for and of kids that must be destroyed</i> (point 4).</p>	<p>Agree. Removed</p> <p>Disagree.</p> <p>Agree. Reworded.</p>
<i>RBP</i>	41	<p>i) Kids cannot digest solid feed as stated before three weeks of age, so why is Best Practice from one week?</p>	<p>Disagree. Solids help rumen development.</p>
5.3	41	<p>This section is all about dairy goats, but all goats lactate. Suggest reword heading to ‘<i>Dairy Does and Milking Systems</i>’.</p>	<p>Disagree. But section title changed.</p>
5.4			
5.5			
<i>General comments</i>	1	<p>The recommended shearing time for angoras of 6 months is primarily to</p>	<p>Noted. RBP added to</p>

		<p>prevent the fibre from coting (producing long, wiry hairs), thereby reducing the value of the clip. The animal experiences no ill-effects from carrying longer fibre up to 8 months as long as normal care is maintained, such as dagging and clipping back eye fringes. It's only the farmer's pocket that suffers. Allowing shearing every 8 months allows goats to be shorn at the same time as sheep and gives less constrained weather choices. This is particularly important for smallholdings and properties where shearing services need to be hired in as shearers often dislike shearing goats due to their lack of lanolin and would not normally travel any great distance to shear goats, especially not for a smallish herd. Requiring a maximum shearing time of 6 months leads to 'shear-time creep' as a succession of 5½ month shears bring the shearing time progressively back into unseasonable times. Minimum shearing frequency for angoras should be 8 months with recommended frequency of 6 months.</p>	<p>state that they should be shorn at least every 8 months.</p>
	511	<p>As shearing is a time of high stress and risk for goats every effort must be made to minimise any pain and/or distress the animals may suffer. Of particular concern is the welfare of the goats that have just been shorn and are exposed to extremes of weather as well as those that have not been shorn for some time.</p> <p>The requirement for shelter for newly shorn goats must be specified and clearly defined.</p>	<p>Covered in MS8 and 14.</p>
<i>Introduction</i>	320	<p>Last sentence, first paragraph: is already covered in Shelter section.</p>	<p>Noted.</p>
<i>MS #13</i>	511	<p>Amend to read:</p> <ul style="list-style-type: none"> <li>e) Goats must be provided with access to adequate shelter and feed (especially hay or other suitable fibre) after shearing, for such time as required to minimise the risk of hypothermia.</li> </ul> <p>Clauses to add:</p> <ul style="list-style-type: none"> <li>f) In winter and when there is a risk of hypothermia an insulating layer of fibre must be allowed to remain on the goat after shearing.</li> </ul> <p>'Adequate shelter' should be defined.</p>	<p>Disagree. But text modified.</p> <p>Disagree.</p>

<i>General information</i>	320	Last paragraph ‘Cashmere goats need to be well fed....’): Another example of overlap between sections.	Agree. Deleted.
5.6			
<i>General comments</i>	511	<p>Selection and monitoring of goats to be used for mating purposes must be done in such a manner so as to minimise any risk of unnecessary or unreasonable pain and/or distress to either competing bucks, or receptive females. Thus would like to see recommended best practice points a, c, and d made into minimum standards.</p> <p>A new minimum standard should be created reading:</p> <ul style="list-style-type: none"> <li>a) Goats selected for mating must be of suitable age, size and condition to experience pregnancy and kidding.</li> <li>b) Competition between bucks for receptive females must be managed to ensure bullying does not occur.</li> <li>c) Where there are fewer receptive females than bucks, harassment of the female must be prevented.</li> </ul>	Disagree. Section deleted.
<i>Introduction</i>	41	<p>The first sentence is unnecessary as self evident.</p> <p>The third sentence is only educational and not part of a Code of Welfare.</p>	Section deleted
<i>Recommended best practice</i>	320	b) ii) the physical size of the buck relative to the <i>goatlings/hoggets</i> or does.....	Section deleted.
5.7			
<i>General comments</i>	511	Oppose the use of any but the most minimally invasive of reproductive technologies and are completely opposed to the use of invasive procedures by anyone by a trained veterinarian and with the animal under appropriate sedative, pain relief or anaesthesia. Concern about ‘trained and competent operators’ to perform significant surgical procedures with no formal legislative way of assuring that these operators have any particular level of competency. Until a definitive and conditional training and qualification scheme is put into place to define a ‘trained and competent operator’, all invasive reproductive procedures must be carried out by a veterinarian.	Disagree.

<i>Introduction</i>	320	Embryo transfer is generally carried out ( <i>deleted achieved</i> ) after does have been treated with a hormonal regime to induce multiple ovulation and then inseminated.	Disagree. Text changed.
<i>MS #14</i>	511	Amend to read: a) Laparoscopic insemination, embryo collection and embryo transfer and electroejaculation, must only be carried out by a veterinarian, using appropriate pain relief, sedatives and anaesthesia. b) Trans-cervical artificial insemination and pregnancy diagnosis must only be carried out by a veterinarian.	Disagree.
5.8			
<i>General comments</i>	5, 45	Supports a complete ban on dehorning, unless it is conducted by a veterinarian under general anaesthesia and with sufficient post-operative analgesia to deaden all pain.	Noted.
	16, 25, 194, 408, 465, 496, 521	Dehorning and debudding should be completely banned due to pain, stress and trauma.	Noted. But will be covered under the painful husbandry procedures code of welfare.
	38, 9, 490	There should be a complete ban on the debudding and dehorning of goats, due to the pain associated with it. This procedure, if allowed, should only be allowed under anaesthetic.	RBP recommends the use of pain relief.
	41	Young castrated dairy goats may commonly experience leg distortion, but we have never experienced that in any other goats, so <i>commonly</i> is inappropriate.	Noted. Text modified.
	102, 246, 413, 465, 496	Goats should not be dehorned but managed appropriately to allow for space and natural behaviour, with free access to outdoor areas.	Noted.
	160	It is scientifically proven that debudding and dehorning of animals causes pain and trauma. Any procedure which can be performed without expert knowledge, proven skill as well as pain prevention and pain relief means the welfare of the animal is irrelevant. Need careful management, understanding and empathy with goat behaviour and full comprehension	General information provided and RBP included that pain relief is used.

		<p>of the requirements of animal welfare legislation so that injuries to other goats and personnel can be avoided.</p> <p>Supports low stress handling methods, humane goat management systems and understanding goat behaviour. If goats are given plenty of space so that their interaction is based on wanting to interact instead of being forced to interact, the issues will significantly diminish.</p>	Noted.
	176	<p>Disbudding and dehorning is apparently a painful practice. This is contrary to the freedom from pain, injury and disease clause in the Five Freedoms. It should be unnecessary to dehorn goats if the number of goats housed together is calculated using the goats' welfare and social structure as a guide rather.</p>	Noted.
	192	<p>Support a complete ban on debudding and dehorning due to the inherent trauma and pain associated with it. The procedure does not alter aggressiveness in herds and with careful management injury to handlers and other goats can be avoided. Goats housed together in doors should be given sufficient space and be kept in smaller herds to forego the need for dehorning.</p>	Noted. But covered in the PHP code of welfare.
	287	<p>Supports a ban on adult dehorning.</p> <p>It is extremely stressful on the animal. While it can be seen as a safety issue it needs to be done when the animal is very young, not when they are adults or the horns have developed.</p>	Noted. But covered in the PHP code of welfare.
	418	<p>Debudding should be done while the kid is very young and thereafter (along with all dehorning) should be carried out by a veterinarian.</p>	Noted. But covered in the PHP code of welfare.
	300	<p>Requests complete ban on debudding and dehorning which is often done by inexperienced people with no pain relief.</p>	Noted. But covered in the PHP code of welfare.
	384	<p>Supports a complete ban on dehorning and debudding. Smaller herds with extra space would negate the need for dehorning.</p>	Noted. But covered in the PHP code of welfare.

	414	Would like to see a total ban on docking and de-horning and other horrible practices.	Noted. But covered in the PHP code of welfare.
	426	Dehorning must be humane, preferably with a local anaesthetic. Animals feel pain, stress, anxiety, etc and it is our responsibility to make sure they are treated well.	RBP recommending pain relief has been included.
	446	Farmers cut off horns, remove tails, and castrate goats. These are all very serious forms of physical abuse and must stop.	Noted.
	523	Disbudding should be banned. There is no evidence that this procedure makes herds more manageable, and it is not warranted by the pain inflicted. Dehorning should only be carried out in emergency situations.	Noted. But covered in the PHP code of welfare.
5.9			
<i>General comments</i>	511	Opposed to any but the most non-invasive and minimal animal identification and only where the identification is required by law or necessary for good animal husbandry. Providing the animal with pre and post procedure pain relief as well as monitoring that animal for any signs of infection or pain is the least we should expect from animal operators/owners.	Noted.
<i>MS #15</i>	320	b) Hot branding and freeze branding must only <i>be</i> used with pain relief.	Disagree. Text modified.
	499	MS and RBP contradict each other. If branding is permissible with pain relief then it should be stated what pain relief should be used, by whom and how far in advance of the procedure. Perhaps a future date for banning this practice could be looked at, if there were acceptable alternative means.	Noted.
	511	Amend to read: b) Hot branding, freeze branding and tattooing must only be applied with the use of a suitable pre-procedure anaesthetic and a post-procedure analgesic. Add following clause: c) Any infection resulting from tag application must be treated promptly.	Disagree.  Disagree. Will be covered by MS 18.

	547	<p>(a) All identification procedures must be applied by a competent operator.</p> <p>Please confirm what is meant by ‘competent operator’ here? The Anglo Nubian Goat Society uses microchips that currently are inserted by the goat owners. Please confirm whether or not they would be considered competent operators under the Code.</p> <p>(b) Hot branding and freeze branding must only used with pain relief.</p> <p>Our belief is that hot branding and freeze branding should not be used on goats ever. To the best of our knowledge all goats are identified by either a tattoo or a microchip, so the requirement that branding can be used with pain relief is inappropriate for goat husbandry. Goats have thin skin and lack a protective fat layer, meaning that branding would constitute a cruel and unnecessary procedure, even with pain relief.</p>	<p>Noted. Competent operator will not cause unreasonable or unnecessary pain or distress to animal.</p> <p>Noted.</p>
<i>Example indicators MS #15</i>	320	No ear injuries or infections <i>are apparent</i> .	Agree. Text modified.
<i>Recommended best practice</i>	320	h) ...this should <i>be</i> done using the appropriate....	Agree. Text modified.
5.10			
<i>General comments</i>	511	Agree with the introduction and are concerned that the stressful nature of transport be mitigated as much as possible through application of good minimum standards. Unfit, pregnant and young goats are those likely to be turned away from processing plants and should not be transported.	Noted. See ‘Transport within NZ’ Code for details
<i>Introduction</i>	320	Last sentence of first paragraph: Slaughter Code is now out and ( <i>both of which are under development</i> ) needs to be changed.	Agree. Text modified.
<i>MS #16</i>	41	b) One of the problems at this stage of commercial goat farming is overcoming foot problems and culling lame goats is an obvious strategy. Requiring four weight bearing limbs could preclude this, leading to less satisfactory disposal. Goats can travel without unreasonable pain or distress as they commonly lie down when travelling anyway. They are not like cattle. Suggest rewording ‘ <i>all goats must be able to travel without</i>	Agree. This MS has been removed.

		<i>suffering or unnecessary pain or distress</i> '.	
	498	b) A member advised that they have observed that compared with other animals, goats will often hold one hoof up and may hop along with it up even if there is only a small lesion on the hoof. It is recommended that the Code should include further guidance regarding selection for transport based on weight bearing, such as 'Goats should be regarded as fit for transport providing they can weight bear on all four limbs if they need to and if there are any lesions on the hoof, they are only minor'.	Agree. This MS has been removed.
	511	Add following clause: e) Small goats with a liveweight less than 11kg, so that carcass weight will be less than 6kg, should not be selected for transport to slaughter, because they are not acceptable to processing plants.	Disagree. But RBP added that goats that are not acceptable for processing are not loaded.
<i>RBP</i>	41	c) Transporting late pregnant feral origin goats not infrequently stimulates abortion, and it would be better to replace ' <i>last three weeks</i> ' to reflect this, such as ' <i>heavily pregnant and especially those anticipated in the last month of pregnancy, should not be transported</i> '.  e) Some markets seek goats lighter than 6kg carcass weight. Whilst current processors may not accept them, that could change. Suggest replace with ' <i>small goats should not be selected if unlikely to be processed</i> '.  f) The point made in the attached Kilgour reference (see also section 3 Water) is relevant here, as mustering slaughter goats early in the day could well have them having no feed for 12 hours anyway, and the wording therefore precludes that.	Disagree.  Disagree on text. But RBP added to this effect.  Disagree.
	548	g) states that prior to transport animals "Should be held off pasture". Rather than using the term "pasture" it may be better to align this statement with those in other animal transporting/welfare documents by using the usually adopted terminology "held off green feed" instead.	Agree. Text modified.
<i>General information</i>	320	Second paragraph: 'Where the journey is long, the goats should be	Agree. Text removed

		accustomed to any dry feed that might be provided at rest stops during the journey.’ This repeats Recommended Best Practice (h).	from the General Information section.
	548	Suggest removal of the following statement: ‘ <i>sheep trucks are not appropriate for transporting dairy does</i> ’.  It is entirely possible for sheep trucks (whether they are dedicated to sheep transport or are convertible to transport multi species) to transport dairy does comfortably. If this statement were to be removed it would still be necessary to convey the message that goats should be transported in relative comfort. Adding a comment such as ‘ <i>should be able to stand in a natural position with adequate airflow between animals</i> ’ should be sufficient.	Disagree. But text modified to reflect that some trucks are inappropriate for transporting does.
<b>6. Health</b>			
<i>General comments</i>	2	Supports section in its entirety.	Noted.
	511	Recommended best practice points c, d and e should be made minimum standards.	Disagree.
<i>MS #17</i>	485	The requirements of MS17 are too imprecise to address the issues of hoof care and worming. Some basics of reasonable care are sufficiently critical to welfare that they need to be made explicit.	Disagree.
	511	Add following clauses: e) Any goat that is unable to stand must receive veterinary attention within 48 hours of becoming recumbent or be destroyed humanely. These recumbent goats must be inspected frequently, kept in an upright position (i.e. lying on their sternum with legs tucked under the body) on a soft dry surface, and shifted from side to side as often as possible.  f) On commercial farms, animal health records must be kept that include details and timing of parasite control measures, foot care procedures, appropriate vaccinations, supplementation of nutrients that are deficient in the diet, culling strategies and cross-grazing with other species as appropriate.	Disagree.

		g) Veterinary advice must be sought when there is: <ul style="list-style-type: none"> <li>• Persistent ill-thrift, lameness, pain or poor performance that does not respond to treatment</li> <li>• Concern about the welfare of the animal</li> </ul>	
<i>Example indicators MS #17</i>	320	Point 1: Appropriate in farming situations. Less so for companion goats.	Disagree.
6.2			
<i>General comments</i>	511	Concerned that there are no minimum standards for the care of goats suffering this painful condition. Recommended best practice points c and d should be made minimum standards as this is the absolute minimum expected level of care that should be required.  A minimum standard should be created reading: a) When an animal is found to be lame, the affected foot must be carefully examined and appropriate treatment sought immediately. b) Those animals not responding to treatment within 3 days must be examined by a veterinarian.	Disagree. Outcome based standards more appropriate.
<i>Introduction</i>	41	Suggest include ' <i>where necessary</i> ' into last sentence before <i>foot bathing</i> . Not all goats are Angora, Boer and Saanen requiring regular foot care.	Agree. Text added.
<i>RBP</i>	41	d) Reads as a promotion for the veterinary profession. Why is this the only health problem recommended for veterinary input? Best Practice is for adequate treatment as necessary and as best provided, and this three-day professional input stipulation is unwarranted.	Agree. RBP removed.
6.3			
<i>General comments</i>	511	Every commercial operator or flock holder should have an animal health plan that is well kept, updated regularly and modified accordingly to improve animal husbandry and welfare. This should be a mandatory requirement in order to minimise the occurrence of animal welfare issues arising from poorly run operations.  Recommended best practice points a and b should be made minimum standards to read:	Disagree. But this is included as an example indicator.  Disagree.

		<p>a) Every commercial flock/herd operator must have an animal health plan drawn up and regularly updated with their veterinarian.</p> <p>b) A recording system relevant to this plan must be kept up-to-date by the person in charge, because regular monitoring of the records aids management and reveals problems.</p>	
6.4			
<i>General comments</i>	41	Diagrams of animal heads: The Code of Welfare loses credibility using sheep heads for goats.	Disagree. Point of aim is relevant.
	511	One of the example indicators as well as recommended best practice point c should be made into minimum standards as these are the absolute minimum required level of care and consideration an owner/operator should be obligated to show their stock.	Disagree. Not always possible. Quick alleviation of animal's pain is priority.
<i>MS #18</i>	511	<p>Add the following clauses:</p> <p>d) Behaviour towards cull goats must be patient and considerate.</p> <p>e) Wherever possible emergency slaughter of goats must be conducted discreetly and at a site distant from other animals so as not to cause anxiety to other goats.</p>	Disagree.
<b>7. Quality Management</b>			
<i>General comments</i>	485	The draft Code fails to derive MS relating to animal health plans and quality management. A legal requirement to produce such documents, to collate and interpret data, and to submit reports on a regular basis to MAF for some form of auditing would increase the likelihood of on-going self review by goat owners and generally have the effect of raising husbandry standards.	Disagree.
	499	It would be helpful to state the minimum skill/training standards for those caring for goats. How/where might training and suitable supervision be acquired?	Disagree. But text added in section 2.1 about animal handling courses.
<b>Appendix II</b>			
	41	It is doubtful that goatlings exceed 50kg in the table.	Section deleted.

		This is another example of the confusion that can be created by including education material. A new goat farmer studying the Code for information in the absence of other information, could well interpret the point about additional feed necessary for grazing goats to apply to their grazing (meat or fibre) goats. Is the additional 30-50% feed allowance for grazing goats only applicable to dairy goats? Suggest more emphasis on the word <i>dairy</i> in this appendix.	
<b>Appendix III</b>			
	41	The definition of <i>kids</i> as only until weaned is questionable. Post-weaned goats are commonly called kids until up to even one year old, as are post-weaned lambs in sheep flocks.  Amend to goatling/hogget/yearling. Suggest the use of phrase “young goat” as a replacement for any specific goatling, hogget, yearling in the Code itself.	Agree. Definition modified.  Disagree.
	320	Cashmere should be written with a capital C. Feed pad is not in Code text. Megajoule is not in the text although MJ is. Metabolisable energy is not in the text. Routine procedures – cannot find the term as such in the text. Share milking is not in the text. Teaser buck is not in the text, but ‘teaser’ alone is and should be defined. Tether = To restrain, <i>fasten or tie up</i> by the head or neck with a rope, chain, collar or halter <i>for the purposes of managing access to feed</i> . [DOC comment 7 <sup>th</sup> May 10 regarding whether this covers Judas goats that are temporarily restrained or tethered in helicopters during transport. Weaner/weanling is not in the text.]	Agree. Agree. Removed Agree. Removed Agree. Removed Agree. Removed Agree. Removed Agree. Defined. Disagree – but relevant part of definition incorporated. Agree. Removed.
	511	The term ‘adequate shelter’ should be defined as ‘ <i>An area in which an animal is able to seek shelter from rain, wind, snow and direct sun.</i> ’.	Disagree.
<b>Appendix V</b>			
	294	Addition of Minium Fencing Standard (here or at a point seen as	Disagree.

		<p>appropriate)</p> <p>To comply with the standards, fence must contain:</p> <ul style="list-style-type: none"><li>• Bulldozed line</li><li>• 9 wires (kept tight at all times)<ul style="list-style-type: none"><li>- min. high tensile 2.5mm diameter galvanised steel</li><li>- bottom wire should be placed 80mm above ground level and above that wires placed at the following intervals: 100, 100, 100, 110, 120, 150, 165mm. The top wire should be approximately 50mm below the top of the post</li></ul></li><li>• No internal stays</li><li>• Posts to be at the following spacings:<ul style="list-style-type: none"><li>- less than 30 degree ground slope - 5metres</li><li>- 30 degrees to less than 45 degrees – 4 metres</li><li>- 45 degrees or more – 3 metres</li><li>- Battens to be at 1 metre intervals</li></ul></li></ul>	
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#### 4) Late submissions

Of the 19 late submissions, 18 support the submission by SAFE; i.e. submissions consist of SAFE form letter or similar content with obvious link to SAFE's submission (#192). The one other late submission received greatly opposes tethering of goats along roadsides as well as practises such as debudding and dehorning (could be linked to SAFE).

Submission #	Name	Representing/Affiliation
1		SAFE Form Letter
2		SAFE Form Letter
3		SAFE Form Letter
4		SAFE Form Letter
5		SAFE Form Letter
6		SAFE Form Letter
7		SAFE Form Letter
8		SAFE Form Letter
9		SAFE Form Letter
10		SAFE Form Letter
11		SAFE +
12		
13		SAFE Form Letter
14		SAFE Form Letter (Sweden)
15		SAFE Form Letter (Netherlands)
16		SAFE Form Letter
17		SAFE Form Letter
18		SAFE Form Letter
19		SAFE Form Letter (Operation Toby)

## **5) Answers to questions posed in Chairman's letter 29<sup>th</sup> April 2010**

### Question 1:

Submission#1: Yes, I think a code of conduct for goats' welfare is necessary. It provides the basis for expectations, education, monitoring and prosecution where necessary.

Submission #2: Yes, I consider a Code of Welfare for goats to be necessary. The reason for this is that the Code sets minimum standards that have legal effect.

Submission #27: The Code of Welfare for goats is highly necessary as is the welfare of any animal in New Zealand. Goats require a lot of care and are too often neglected and assumed they can fend for themselves. I strongly believe people should be trained in goat husbandry.

Submission #41: Code for goats is necessary. However if it is going to include educational elements, there are other better educational vehicles and methods.

Submission #319: Yes, or you have to have a Code that covers all domesticated farm animals.

Submission #499: Yes, this is a really informative resource – very readable and helpful to state both minimum and best practice requirements. A definitive resource against which all in NZ must comply can only be good.

### Question 2:

Submission #1: The minimum standards are too stringent for smallholders as discussed above. I think the standards need to be issued as a code where essential and as best practice where either compensating practices are specified or where they are impractical. I would not like to see the code used to stop people owning a pet goat or small herd.

Submission #2: No, I do not agree that the minimum standards in this draft Code are the minimum necessary to ensure that the physical, health, and behavioural needs of goats will be met. Section 2. Stockmanship and Animal Handling is deficient. In my view, the tethering of goats should not be allowed. Consequently, I think that what the draft Code has as a Recommended Best Practice, "Goats should not be tethered at all as they are social animals," should be a Minimum Standard. A more detailed argument follows later in this submission.

Submission #27: The minimum standards in the code are very important and are the basic needs for goat welfare. They should not be any less than what is stated in the proposed code.

Submission #41: Yes to minimum standards, subject to specific comments attached.

Submission #319: No. There is no formal definition of shelter that applies to all 'owned goats', i.e. tethered goats.

### Question 3:

Submission #1: I think the examples are very useful and should be extended with both indicators for good and poor performance. One indication is the mortality rate, allowing that a farm that buys elderly animals or is breeding is likely to have a higher mortality rate than a non-breeding does alone.

Submission #2: If I accepted that the Minimum Standards set out in this draft Code were appropriate, I would agree that the example indicators are appropriate. However, since I maintain that Minimum Standard No. 4 – Tethered Goats is inappropriate, it follows that I have similar reservations about the example indicators that go with it. A more detailed argument follows later in this submission.

Submission #27: I agree the example indicators for best practice are appropriate and should be strictly followed by any goat owners.

Submission #41: Yes to most indicators, subject to specific comments attached.

Submission #319: There is no formal definition of shelter (other than loafing barn) for sick, young, unhealthy or tethered goats.

### Question 4:

Submission #1: The recommendations for best practice are very good, except as indicated specifically above.

Submission #2: I agree that most of the recommendations for best practice in this draft Code are appropriate. The exception is the area that deals with tethering goats. A more detailed argument follows later in this submission.

Submission #27: I agree the recommendations for best practices are appropriate and should be strictly followed.

Submission #41: Yes to appropriate Best Practice recommendations, subject to specific comments attached.

Submission #319: Yes.

#### Question 5:

Submission #1: I think, with proper education, monitoring and access to an on-line resource this code will greatly improve husbandry, especially for new owners or people who have moved south from warmer climates (including the north island!).

Submission #2: As it stands, the draft Code does not change anything relating to the tethering of goats. It allows callous owners/handlers to continue tethering their goats on roadside verges.

Submission #27: I believe the code would change the existing arrangement for the management of goats provided the training is given to goat owners and goats are checked at random by inspectors. New and existing goat owners should be required to attend goat husbandry training following the implementation of the code.

Submission #41: No change to existing arrangements, subject to specific comments attached.

Submission #319: Only if follow-up inspections are made or as a result of this code complaints are made by the public or industry and the complaints are investigated.

#### Question 6:

Submission #1: As the code stands would entail cost for me in the area of formal training for goats as opposed to livestock in general and for 'immediate' access to specialist veterinary services. It could also add cost if the shearing frequency is stringently applied. There would also be an indirect cost in higher taxes or reduction in other services to pay for the cost of applying and monitoring the code. The latter cost is acceptable to me as long as I see the code applied with education and don't feel I'm paying for a Nannie State.

Submission #2: Complying with the Code will not involve costs for me.

Submission #41: Specific examples attached show potential costs to our own business.

Submission #319: No.

#### Question 7:

Submission #1: The biggest barriers seem to be lack of awareness of the code, access to supporting knowledge and cost of monitoring. The first two can be addressed through promotion of education resources through stock agents and rural suppliers (CRT, Wrightson etc). Monitoring can best be accomplished through peer pressure, boosted by support by NAWAC for Federated Farmers, Rural shows and local husbandry clubs (like gardening clubs). Much as I hate to suggest it the monitoring could be augmented by checking mortality rates in tax returns.\

Submission #2: I can see no barriers to the implementation of the draft Code, or the implementation of the Code in its final format incorporating the changes relating to tethering I am recommending.

Submission #27: I can foresee a problem with the code being enforced as goat owners often live on farms and the animal abuse may not get noticed. This is why I recommend goat owners to be licensed and animals inspected at random.

Submission #41: There is a need to tighten some working in the draft to avoid unnecessary problems in future implementation.

Submission #319: If the code is not accepted by the goat industry little will change unless education and enforcement are carried out. Education is the most important. The leaders of the industry must take heed and accept the code and its conditions, but it must not be watered down to gain compliance.

#### Question 8:

Submission #1: I think the benefits would accrue largely to the animals. Bad owners are already self-selecting out as their holding costs and mortality rates become too high. NZ's goat husbandry industry is too small to gain much advantage from perceptions of NZ as a goat exporter. The code might help support our clean green image in a minor way (but less than the cost of implementing it).

Submission #2: The main benefit of the Code is that it provides increased certainty about animal welfare.

Submission #27: I see many benefits by the implementation of the code. It will make goat owners think twice before mistreating goats due to the consequences and the increased awareness of the mistreatment of goats. And people who consider themselves good goat owners will be up skilled in the treatment of their goats.

Submission #41: Benefits from this Code of Welfare will ensure adequate goat welfare and potential improved marketability.

Submission #319: Setting a standard that will enhance NZ's reputation as a fair producer of animal products with animal welfare at the fore rather than just production.

Submission #499: Yes, this is a really informative resource – very readable and helpful to state both minimum and best practice requirements. A definitive resource against which all in NZ must comply can only be good.

#### Question 9:

Submission #1: The biggest negative impact would be if goat owners decided it was all too much trouble and let their animals loose.  
The biggest positive impacts would be:

- a. improvements to animal welfare,
- b. increasing the number of goat owners because they can rely on the quality of the guidelines,
- c. greater awareness of animal welfare and farming practices in general and
- d. helping to complete our clean, green husbandry image.
- e. possible improved reporting of neglect, although this might be offset by reduced trust between neighbours if well-meaning but poorly informed people perceived lack of care incorrectly.
- f. BUT the administration cost to taxpayers for yet more government would increase, (minor if the same staff are used and the code is augmented by subsidized publications distributed by the web or rural suppliers).

Submission #2: The Code, with the increased certainty about animal welfare it brings, will help to make New Zealand society more caring.

Submission #319: The continuation of developing humane animal welfare codes will enable the producers to gain and retain access to the high value and added value markets.

Submission #499: Yes, this is a really informative resource – very readable and helpful to state both minimum and best practice requirements. A definitive resource against which all in NZ must comply can only be good.

## **6) Appendix: SAFE website content**

### **GOATS IN NEW ZEALAND NEED YOUR HELP**

The majority of goats in New Zealand are farmed for their milk, wool (mohair and cashmere) and meat. In 2007, over 110,000 goats were reared on farms. However, during the early 1990s when the demand for goat fibre was high, the nation's farmed goat population exceeded one million. Today, goat farming still remains a relatively small and niche market, although industrialised indoor rearing systems are becoming more prevalent as the industry grows.

The gregarious and friendly nature of goats makes them appealing animal companions. Sadly, however, many of these goats end up becoming little more than cheap lawnmowers, tethered alone on roadsides around the country.



Goats are also popular prized-additions on game estates and safari parks in New Zealand where they are hunted and shot by wealthy hunters.

### **Goats and animal welfare**

The National Animal Welfare Advisory Committee (NAWAC) has recently issued the proposed welfare Code for goats, which governs minimum animal welfare standards for goats, excluding those that are wild.



"The SPCA are also opposed to tethering, and given how vulnerable goats are to roadside attacks, NAWAC should have no excuse to allow the practice to continue," says Mandy.

SAFE is calling for tougher minimum standards and a ban on dehorning and roadside tethering. SAFE has made a submission and called on New Zealanders do the same to pressure NAWAC to address some of the key welfare concerns in the draft Code.

## Key welfare points in SAFE's submission.

- Improved training standards and requirements for goat handlers on commercial farms.



- A complete ban on tethering. Goats are social animals and must be kept in groups, either securely fenced in a paddock with shelter provided, or in indoor housing. Tethering makes it impossible for goats to express their normal behaviour as required by the AWA and leaves them vulnerable to attacks by dogs and torment by people. Goats also suffer from stress when isolated.

- A complete ban on debudding and dehorning due to the inherent trauma and pain associated with it. This procedure does not alter aggressiveness in herds and with careful management injury to handlers and other goats can be avoided. Goats housed together indoors should be given sufficient space and be kept in smaller herds to forego the need for dehorning.
- Goats housed indoors must be given sufficient feeding space, enrichment areas that include resting areas that allow all goats, including the subordinate ones, to feed, drink and lie down.
- Horned and non-horned goats must not be reared together, as horned goats are prone to bullying.
- Kids must not be separated from their mother for at least six to seven weeks, until they become less dependent on mother's milk.
- Mixing unfamiliar goats or herds should be avoided wherever possible. Studies have shown evidence for increased stress in goats that have had group cohesion disrupted.