

Animal Welfare Policy
Ministry for Primary Industries

PO Box 2526

Wellington 6140

ATTN

Out of Scope

s 9(2)(a)

19-5-2016

Submission on Animal Welfare Regulations

Greetings

Thank you for your note ~ 18 May 2016.

I would comment on -

Clause 233 Question one - No.

Clause 233 Question Two - Yes.

In general, I believe the proposed Regulations will be of ~~interest~~ benefit for the welfare and health of animals. The description of regulations for different types of animals, birds, fish etc.

Yours Sincerely,

Michael

O'Neill

Phone etc

Nil

s 6(a)

9 May 2016

The Ministry of Primary Industries
PO Box 2526
Wellington 6140

Dear Sir/Madam

Re: Animal welfare rules

We wish to lend our support to any initiatives regarding the improvement of shade and shelter for animals in paddocks and for dairy cows awaiting milking.

We have long been concerned about this. We have seen animals in 31 degree temperatures trying to get shade from fence posts because they are in paddocks with no proper shade or shelter. Likewise cows too are forced to wait in these high temperatures that we experienced this summer in the Wairarapa.

Many thanks
Yours sincerely

S Braggins

Sue & Ashly Braggins

Philip McKibbin

s 9(2)(a)

14 May, 2016

Animal Welfare Policy
Ministry for Primary Industries
PO Box 2526
Wellington 6140

To Whom it May Concern,

I am writing in regard to the regulations released for consultation in April 2016.

My main concern with this process is the limited time that has been allocated for consultation. The Cabinet Manual 2008 requires that sufficient time be allowed for meaningful consultation, and that proper consultation takes place, but neither of these conditions is being met.

The short timeframe given for consultation, combined with the large number of regulations being consulted on, severely hinders the ability of not-for-profit (e.g. Safe) and volunteer-run groups (e.g. the New Zealand Animal Law Association) to make submissions. These groups perform an especially important function in consultation processes such as this, as they often have the support of large numbers of people, and they are able to harness relevant expertise, and so provide high-quality recommendations. Unfortunately, these organisations are at a distinct disadvantage compared to commercial organisations, which are able to devote substantial resources to engaging with proposals that bear on their profitability. Animal welfare is, in my view, more important than both profit and expediency – but in this process, it is being treated as a lower priority.

I am concerned that this short timeframe will mean the overall thrust of the submissions received will not adequately reflect the views held by the New Zealand public.

I would also like to express my support for Safe's recommendations:

I would like you to conduct a full and thorough review of factory farming as a whole, including all the animals trapped indoors in permanent confinement. We should not be regulating practices that breach NZ's own Animal Welfare Act; we should be looking into the future and creating a plan to ban them.

Please remove the regulations you have created regarding factory farmed animals, such as the ones that relate to farrowing crates and colony cages. Then set a date to review these and all other factory farming practices.

Factory farming is an abhorrent practice, and New Zealand needs a long term strategy for phasing it out. A factory farming review will send a message to industry to guide future investment, as well as give an opportunity to address the largest animal welfare issue facing New Zealand.

I also ask that you consider the evidence that rodeos are cruel, and ban them. The animals will not perform if not distressed by a variety of means, such as the flank strap.

Finally, I would like to you to ban the use of exotic animals in circuses. There is ample evidence that these animals suffer in captivity, and there is no reason to allow that suffering for entertainment purposes.

Thank you for considering my submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Philip McKibbin', with a long horizontal flourish extending to the right.

Philip McKibbin

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982



Animal welfare proposed regulations feedback submission form

Your name: TRACEY MCINTOSH

Your organisation (if applicable): _____

Your contact details: _____

Your feedback: PROPOSAL 61. Dogs - Dew claws

I fully support dew claws removal in puppies under the age of four days old. It will prevent injury in the future. As in older dogs it can be painful and distressing if an injury happens. I believe as a responsible breeder and owner prevention is better than cure.

Feel free to continue your submission on additional paper and staple it to this form.

Please place your feedback inside the feedback box. Alternatively, take this form with you and post your feedback to Animal Welfare Policy, Ministry for Primary Industries, PO Box 2526, Wellington 6140.

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Animal welfare proposed regulations feedback submission form

Your name: Tracey McIntosh

Your organisation (if applicable): s9(2)(a)

Your contact details: [Redacted]

Your feedback: Proposal 62. Dogs - Tail Docking

I believe that puppies under four
days age do not have a fully developed
suspending system. So tail banning is not painful
and I also believe they do not suffer
socially or physically.

Feel free to continue your submission on additional paper and staple it to this form.

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ANIMAL WELFARE POLICY.

16 May 2016

Ministry of Primary Industries
PO Box 2526
Wellington 6140.

Dear Sir/Madam

I find the NZ Porks "Pigcare Accredited" label quite misleading when these animals will still suffer in farrowing crates & fattening pens. This practise should be banned outright as the animals cannot exhibit natural practises ie nest building, & mud baths. Its imprisonment of animals. It is the same for chickens in cruel colony cages, making the cages fractionally larger will not ease the stress on them. Chickens roost, scratch in the dirt & have somewhere to get away from a dominant bird if its pecking them.

These creatures are not dumb and have a right to a pleasant life not torture. This is NZ in the 21st century!! Please I urge you to protect them & do away with misleading labels, and their imprisonment.

Yours sincerely

A.D. Jones
(Sheena Jones)

To The Ministry of Primary Industries,

In regards to the regulations released for consultation in April 2016, this is my submission.

I do not believe you have allowed sufficient time for me to adequately consider the issues you have raised.

The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed.

I do not believe your consultation process has been in good faith. I bring to your attention the Parliamentary Counsel Office guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states: "The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and if necessary start the decision making process afresh."

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in just five weeks.

Please consider this opportunity as a real chance for change

Kind regards,
Hannah Wylie

The Secretary
Canterbury Combined Terrier Club (Inc)

s 9(2)(a)

10th May, 2016.

Animal Welfare Policy
Ministry for Primary Industries
P.O. Box 2526
Wellington 6140

Animal Welfare Proposed Regulations.

SUBMISSION FROM THE CANTERBURY COMBINED TERRIER CLUB INC.

The Canterbury Combined Terrier Club was set up in 1949 to promote and popularise terrier breeds and recommend breed standards. It organises terrier shows, gives advice to prospective terrier owners, and holds events for pet owners. The CCTC is the only dog club in the South Island to specifically serve the interests of terrier owners, breeders and exhibitors.

Many of the 30 terrier breeds in New Zealand are docked breeds, and the Club believes it is important for the future of pedigree dog breeding in New Zealand that Freedom of Choice over this procedure is allowed to continue. It therefore supports the New Zealand Kennel Club and the New Zealand Council of Docked Breeds in their submissions.

In addition, the CCTC wishes to submit that the present right of breeders to remove the dewclaws of puppies before the age of 4 days should be retained to prevent future injury to the dog.

PROPOSAL 61. DOGS - DEWCLAWS

The removal of dewclaws in puppies up to the age of 4 days by persons other than veterinarians is presently allowed by the 2010 Code of Welfare (Dogs) Minimum Standard 16.

The CCTC strongly urges that the status quo be continued in this matter. This procedure is a simple operation at this early age, taking only a few seconds to perform and seldom involving even slight bleeding. Breeders carrying out this procedure use sterilised scissors, and have at hand means to stop any bleeding that occurs. When returned to their mother, her licking will also help heal the slight, skin-deep wound that results. When questioned as to why dewclaws were an issue at all, officials at the Christchurch consultation meeting gave as a reason that the procedure involves a bone, so is seen as significant surgery. In practice, at the age of under four days old the dew claw is only gristle or cartilage, easily removed with small sharp scissors. When carried out at the breeder's home the puppy is soon back with its mother and littermates, and minimal distress and disruption results.

Breeders remove dewclaws to avoid pain and injury to the dog in later life, caused by catching the claws on material, fences, or undergrowth or having the claw knocked or pulled while the coat is being combed. Some pet owners forget to trim these nails, which are often hidden in leg hair. This can result in infection, when the claw can grow in a hook into the leg itself. As these potential problems

can easily be prevented at this early stage, most breeders of pedigree dogs remove the dewclaws as a matter of routine management.

There seems to be an argument that this vestigial toe is useful to the dog in running and managing objects. Dogs use their paws to hold down objects, not their dewclaws, which are rigid and have no manipulative power. To do so would be as awkward as a human trying to hold an object with their inner wrist, in preference to their hand. Greyhounds can run perfectly well without dewclaws, which are often injured in racing if present. As with tails, a few dogs are born without dewclaws, even on their front legs. The presence of rear dew claws varies greatly from breed to breed. These facts imply that dew claws are far from important in a dog's functioning.

PROPOSAL 62. DOGS – TAIL DOCKING

The present Code stipulates that the tails of puppies less than 4 days old may only be shortened or removed by an accredited operator, using the tail banding method. There is a documented quality assurance scheme in operation for the purpose of accreditation, the Accredited Banders Scheme. Pedigree puppies of docked breeds can no longer be registered with the NZKC unless their tail banding has been carried out by a member of the Accredited Banders Panel. The CCTC believes that this arrangement has proved to be an effective way to prevent potential animal welfare issues arising from this procedure, in pedigree dogs registered with the NZKC. It therefore wants to see this continue in its present form. When queried on the point, the members of the consultation panel who visited Christchurch said that they had not been made aware of any instance in which the present system had resulted in injury or abuse. This seems to prove that it is working well.

Scientific evidence to show that blood cortisol levels do not rise significantly in tail-banded neonate puppies was placed before the National Animal Welfare Advisory Committee at the time that the 2010 Code of Welfare (Dogs) was under consultation. This evidence continues to support the accepted view as stated by NAWAC that "Puppies that still have their eyes closed are developmentally immature and less likely to experience pain in the same way as dogs that are older..." (2010 Code of Welfare Dogs, p. 29). Breeders of pedigree puppies care very much about their welfare, and closely observe and monitor litters which are usually raised in the rooms of their family homes. They judge from experience, not theory.

As many extremely expressive and active dogs belong to the Terrier group of dogs, and many of these breeds have banded tails, we strongly question findings that communication and balance are adversely affected by the dog having a shortened tail. Terriers with shortened tails don't have any problem communicating their feelings to either humans or other dogs, far from it. Catching rats, possums, rabbits, and, in the case of the Australian Terrier, snakes, involves hair-trigger reactions. There is no evidence that terriers with natural tails are any better at their ancestral jobs than when docked. The tails of different breeds of dog vary widely in their strength. Those of traditionally docked breeds tend to be weaker, as part of their genetic inheritance, hence the need to dock in the first place.

The Committee of the Canterbury Combined Terrier Club appreciate the opportunity to submit on these matters.

Jill Watson
Secretary
Canterbury Combined Terrier Club (Inc)
s 9(2)(a)

Ministry of Primary Industries

P. O. Box 2526

Wellington

6140

14th May 2016

s 9(2)(a)

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016.

I would like you to conduct a full and thorough review of factory farming as a whole, including all the animals trapped indoors in permanent confinement. We should not be regulating practices that breach NZ's own Animal Welfare Act, we should be looking into the future and creating a plan to ban them.

Please remove the regulations you have created regarding factory farmed animals, such as the ones that relate to farrowing crates and colony cages. Then set a date to review these and all other factory farming practices.

Factory farming is an abhorrent practice, and New Zealand needs a long term strategy for phasing it out. A factory farming review will send a message to industry to guide future investment, as well as give an opportunity to address the largest animal welfare issue facing New Zealand.

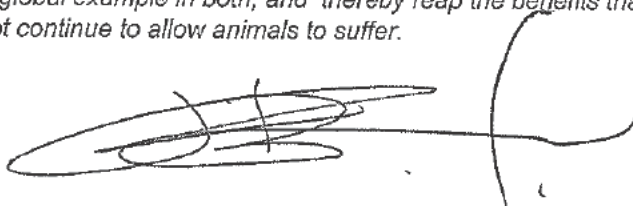
I also ask that you consider the evidence that rodeos are cruel, and ban them. The animals will not perform if not distressed by a variety of means, such as the flank strap.

Finally, I would like you to ban the use of exotic animals in circuses. There is ample evidence that these animals suffer in captivity, and there is no reason to allow that suffering for entertainment purposes.

It is my fervent belief that as a civilized society we need to set an example of compassion and care for the sentient beings with whom we share this planet. To continue to allow acts of cruelty to take place will ultimately work against the health of the planet and negatively affect current and future generations. The measure of civilized behaviour is compassion, and New Zealand has the opportunity to set a global example in both, and thereby reap the benefits that will inevitably follow. Please do not continue to allow animals to suffer.

Kind regards

Frances Broadhurst





Animal welfare proposed regulations feedback submission form

Your name: Lyn Dunscombe

Your organisation (if applicable): NZKC

Your contact details: [REDACTED]

Your feedback: PROPOSAL 61. Dogs - Dew claws

I have not removed dewclaws
from our dogs for 30 years
and I can see no reason
to do so ever.

However I would much
prefer to see time, energy
and money going into
the saving of our
children from violence.

Please forget about dogs
dew claws and start
thinking about the nations
children.

Feel free to continue your submission on additional paper and staple it to this form.

Please place your feedback inside the feedback box. Alternatively, take this form with you and post your feedback to Animal Welfare Policy, Ministry for Primary Industries, PO Box 2526, Wellington 6140.

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Animal welfare proposed regulations feedback submission form

Your name: Lyn Dunscombe

Your organisation (if applicable): NZICC

Your contact details:

Your feedback: Proposal 62. Dogs - Tail Docking

It is high time we had
our priorities right in this
country.

Fancy stuffing around worrying
about dogs tails when we
can't even care for all
the nations children properly.

I personally couldn't care
less about removing dogs
tails, but I care a lot
about the safety of
our children.

Feel free to continue your submission on additional paper and staple it to this form.

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Submission on Animal Welfare Policy

To: Ministry of Primary Industries

PO Box 2526

Wellington 6146

From: Noeline Gannaway

s 9(2)(a)

I am writing as an individual on behalf of a group of animals whose suffering has largely been hidden.

The report GE Animals in New Zealand, produced by GE Free NZ in Food and Environment, documents trials carried out over the past fifteen years by AgResearch at their Ruakura facility in Hamilton. Published in October, 2015, it presents information from Official Information Act (OIA) requests and health details in AgResearch's annual reports submitted to the Environmental Risk Management Authority (ERMA) - now the Environmental Protection Authority (EPA).

It is a deeply disturbing account of chronic animal illness, failure to reproduce, sudden deaths and gross deformities.

Carefully selected reporting of its failures allowed AgResearch to avoid scrutiny into the tragic results of using animals as bioreactors. Moreover, the transgenic animal experiments could not benefit human health: the proteins ^{that} cows were modified to express in their milk were already available on the market;

I submit that, in the interests of animal welfare, transgenic animal experiments be re-evaluated and banned. The facility should be closed down as soon as possible. In December 2014, 19 transgenic cows were surviving at the Ruakura facility. They should be retired from experimentation, and allowed to die naturally.

Thank you for considering my submission.
I would also support those from SAFE.

Yours sincerely,

Noeline Gannaway.

Noeline Gannaway. 1st May, 2016.



Animal welfare proposed regulations feedback submission form

Your name: Wendy Bruning

Your organisation (if applicable): Cant. Combined Terrier Club

Your contact details: s 9(2)(a)

Your feedback: PROPOSAL 61. Dogs - Dew claws

I have been breeding & showing dogs for 35+ years. I used to take mine to the vet to have dewes removed but after a horrible experience I vowed to learn to remove myself. I had a bitch who got so stressed being moved with her pups to vets to have dewes removed she no longer would feed her pups. I have performed this small procedure for the last 20 yrs without any problems whatsoever & find it far better to do at home & far less distressing for mother & pups. They are done at 3 days old so no bone has formed yet. The pups have not yet got bone only gristle, there is no bleeding, much easier. I keep sterile conditions also. I cannot see the reasoning to upset your whelping bitch to take her somewhere she does not know, & people she does not know to have pups dewes done. s 9(2)(a) helps me as she was a vet nurse & has done dozens of removals. I think it would be a good idea if there were classes for people to learn how

Feel free to continue your submission on additional paper and staple it to this form.

to do removals in the quiet of their own home.

Please place your feedback inside the feedback box. Alternatively, take this form with you WR.B. and post your feedback to Animal Welfare Policy, Ministry for Primary Industries, PO Box 2526, Wellington 6140.

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Animal welfare proposed regulations feedback submission form

Your name: Wendy Bruning

Your organisation (if applicable): Canterbury Combined terriers Club

Your contact details: s9(2)(a)

Your feedback: Proposal 62. Dogs - Tail Docking

I have always felt that if you want your dog to have a short tail, so be it. There is no scientific evidence that docking causes pain or is cruel. I have seen dogs with long tails broken or mutilated a real mess + an operation was the only way out for an older dog.

Whereas when under 3 days old if done then it's not a problem, no pain, nervous system is still developing. Why dogs? Sheep + Cows tails have been docked for years + they have a relatively high developed pain sense. Just doesn't make any sense to me suddenly it's become a real issue for those who think they know better about people's pets + what's best for them.

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Animal welfare proposed regulations feedback submission form

Your name: Carrie Tolley.

Your organisation (if applicable): _____

Your contact details: s 9(2)(a)

Your feedback: PROPOSAL 61. Dogs - Dew claws

I have seen many dogs with dew claws rip their dew claws off by either jumping a fence or simply by digging. This is very painful for the dog.

I have also seen the damage that a dog can do to a bitch when a mating takes place and has ripped the side of the bitch. Taping the dew claws during mating was not an option as the dog simply found it uncomfortable and not natural.

I oppose to the ~~etc~~ changes puppies at the first 3 days of their life feel no pain when removing dew claws as soon after birth the dew claws are more like fingernails than appendages. And when removed at this age can be removed easily and require no stitches

I oppose the introduction of banning dew claw removal and contend that this is not in the best interest and welfare of the dogs.

Feel free to continue your submission on additional paper and staple it to this form.

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Animal welfare proposed regulations feedback submission form

Your name: Carrie Tolley

Your organisation (if applicable): _____

Your contact details: _____
s 9(2)(a)

Your feedback: Proposal 62. Dogs - Tail Docking

There have been reasons why dogs tails are docked and if these dogs retain their tails they will do damage to them. Many dogs that have retained their tails have had to have surgery because of injury to the tail. because the dog was doing what the dog was breed to do be it jumping, digging, & hunting in holes. (overseas proof)

There is no significant evidence that ~~docking~~ banding puppies tails causes pain or is cruel.

Puppies are banded at a much younger age than lambs and yet farmers are allow to at a much older age

I oppose the introduction of the banning of dogs tail shortening, and contend that this is NOT in the best interest and welfare of the dogs

Feel free to continue your submission on additional paper and staple it to this form.

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12 MAY 2016

Animal welfare proposed regulations feedback submission form

Your name: ^{s 9(2)(a)} [REDACTED]

Your organisation (if applicable): DOG OWNER

Your contact details: ^{s 9(2)(a)} [REDACTED]

Your feedback: MY SUBMISSION IS ATTACHED

Proposed Animal Welfare Regulation Amendments.

4.1.3. Strict Liability.

4.1.5. Defences.

Question 13. Would it be appropriate to expand the second defence above to include "necessary for the preservation, protection or maintenance of human life or animal life" ?

This should DEFINITELY be included.

In my own case I was found in Court in Palmerston North in 2014 to be guilty of cruelty to a dog when I, at the time 70 years of age, while out walking my small dog in a public street hit once with my walking stick a larger dog that was attacking my dog.

The Animal Welfare Act requires me as an owner or person in charge of an animal to "provide protection from, and rapid diagnosis of, injury and disease." Yet when I protected myself and my dog by the only means immediately available I become a criminal. I genuinely feared for my dog's life. The stupid Judge said that I should have run away. A seventy year old with two wonky knees requiring me to use a walking stick on longer walks cannot outrun a blue heeler intent on doing damage.

Submission from Ingrid Douglas.

s 9(2)(a)

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016.

(1) I would like you to conduct a full and thorough review of factory farming as a whole, including all the animals trapped indoors in permanent confinement. We should not be regulating practices that breach NZ's own Animal Welfare Act, we should be looking into the future and creating a plan to ban them.

(2) Please remove the regulations you have created regarding factory farmed animals, such as the ones that relate to farrowing crates and colony cages. Then set a date to review these and all other factory farming practices.

(3) Factory farming is an abhorrent practice, and New Zealand needs a long term strategy for phasing it out. A factory farming review will send a message to industry to guide future investment, as well as give an opportunity to address the largest animal welfare issue facing New Zealand.

* (4) I also ask that you consider the evidence that rodeos are cruel, and ban them. The animals will not perform if not distressed by a variety of means, such as the flank strap.

(5) Finally, I would like to you to ban the use of exotic animals in circuses. There is ample evidence that these animals suffer in captivity, and there is no reason to allow that

(6) give the SPCA some teeth!
If CYFs can remove children,
why can the SPCA not remove,
and confiscate cruelly treated animals.
en Mrs Powers!!!!

phone

s 9(2)(a)

signed:
Ingrid Douglas
!! That was shocking !!
PTO
→

I buy only:

Free Range Pork.

Free Range chickens.

Free Range eggs.

No Veal due to Bobby calf treatment.

Organic milk which does not over
tax the environment! \$9 per
kilo of organic milk solids makes

sense!!! The world is over
supplied with milk from large farms
with high stocking and high yield
milk.



Animal welfare proposed regulations feedback submission form

Your name: SHARON WAKEFIELD

Your organisation (if applicable): NEW ZEALAND KENNEL CLUB

Your contact details: § 9(2)(a)

Your feedback: = Tail Banding:

I support the current scheme of banding tails under the Dog Code of Welfare 2010. I believe banding tails of puppies under 4 days of age is not a painful procedure and have seen no evidence that banded dogs suffer socially or physically in any way. MPI are going beyond their powers in attempting to prohibit this scheme.

= Dew Claws: As puppies under 4 days of age do not have a fully developed nervous system the pain of dew claw removal is not significant, as there is no cutting through bone or stitches required - therefore I support the removal of dew claws in puppies ^{under} 4 days of age either by a vet or an accredited person. Responsible breeders remove dew Claws to prevent injury to the puppies in the future.

Feel free to continue your submission on additional paper and staple it to this form.

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Animal welfare proposed regulations feedback submission form

Your name: ANN ROSS

Your organisation (if applicable): NEW ZEALAND KENNEL CLUB

Your contact details:

s 9(2)(a)

Your feedback: * Tail Banding:

I support the current state whereby banding can be carried out under the quality assurance scheme under the Dogs Code of Welfare 2010. There have been no issues whatsoever with this scheme and mpi are going beyond their powers in attempting to prohibit a scheme that has raised no issues. Research shows puppies under 4 days of age do not have a fully developed nervous system and so banding is not a painful procedure, nor is it a surgical procedure. Having been involved in dogs for 45 years I have seen no evidence that banded dogs communicate less effectively than tailed dogs or suffer in any other way socially or physically and I have seen no scientific research to support this.

- * Dew Claws: UK and Australia allow the removal of dew claws on puppies under 4 days of age. Research shows puppies under 4 days of age do not have a fully developed nervous system so pain is not significant. Dew claw injury in older dogs is painful, expensive and distressing for dogs and owners - all the proposed changes is doing is = PTC

Feel free to continue your submission on additional paper and staple it to this form.

Please place your feedback inside the feedback box. Alternatively, take this form with you and post your feedback to Animal Welfare Policy, Ministry for Primary Industries, PO Box 2526, Wellington 6140.

You can also email your feedback to animal.welfaresubmissions@mpi.govt.nz

Submissions close 5pm 19 May 2016.

Any submission you make becomes public information. Anyone can ask for copies of all submissions under the Official Information Act 1982 (OIA). The OIA says we must make the information available unless we have a good reason for withholding it. You can find those grounds in sections 6 and 9 of the OIA. Tell us if you think there are grounds to withhold specific information in your submission. Reasons might include, it's commercially sensitive or it's personal information. However, any decision MPI makes to withhold information can be reviewed by the Ombudsman, who may require the information be released.

penalizing those responsible breeders who remove dew claws to prevent injury to the puppies in the future. Correctly done there is no cutting through bone or stitches required - for this reason I support dew claw removal in puppies under 4 days of age, either by a vet or an accredited person under a quality assurance scheme, I believe mpi have gone beyond their regulatory power by attempting to capture a rocodile that Parliament never intended to be included. Compliance is an issue as well, how on earth can this be monitored. Are NZKC members who are responsible dog owners easy targets. - this is not addressing the 10 per cent of bad dog owners.

Rec'd 19/05/15

Ministry for Primary Industries
Manatū Ahu Matua



Animal welfare proposed regulations feedback submission form

Your name:

Patricia Brooker

Your organisation (if applicable):

Your contact details:

Your feedback:

PROPOSAL 61. Dogs - Dew claws

I have strong feelings that dew claws should be taken off. I have personally seen awful injuries when people don't remember to cut the nails never mind the dew claws. Being taken off before 3 days from my experience the pups don't make a sound if correctly done.

Feel free to continue your submission on additional paper and staple it to this form.

Please place your feedback inside the feedback box. Alternatively, take this form with you and post your feedback to Animal Welfare Policy, Ministry for Primary Industries, PO Box 2526, Wellington 6140.

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Animal welfare proposed regulations feedback submission form

Your name:

Patricia Brooker

Your organisation (if applicable):

s 9(2)(a)

Your contact details

Your feedback:

Proposal 62. Dogs - tail docking

I personally don't like tail docking BUT feel that it is up to the individual to decide. Again IF this is done before 3 days and by an experienced breeder/vet it should be allowed

Feel free to continue your submission on additional paper and staple it to this form.

Please place your feedback inside the feedback box. Alternatively, take this form with you and post your feedback to Animal Welfare Policy, Ministry for Primary Industries, PO Box 2526, Wellington 6140.

You can also email your feedback to animal.welfaresubmissions@mpi.govt.nz

Submissions close 5pm 19 May 2016.

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From: Stephanie Lane s 9(2)(a)
Sent: Thursday, 5 May 2016 4:45 p.m.
To: Animal Welfare Submissions
Subject: Timeframe for consultation

To the Ministry of Primary Industries

I see that submissions regarding animal welfare regulations are open. I also see that a mere 5 weeks is available for over 100 pages to be considered and submissions written.

I do not consider this to be in good faith.

It is not possible to consider the regulations around all factory-farmed animals, bobby calves, live exports and rodeo in five weeks.

I ask that you please increase the time available and also publicise this more openly. It was only by chance that I came to know about it and this is a topic very close to my heart. If I barely noticed, most won't.

~Stephanie Lane, BVSc

*Until he extends his circle of compassion to include all living things,
man will not himself find peace. - Albert Schweitzer*

From: Trina Burt s 9(2)(a)
Sent: Wednesday, 4 May 2016 5:17 p.m.
To: Animal Welfare Submissions

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision- making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Micah Dash s 9(2)(a)
Sent: Friday, 6 May 2016 8:17 a.m.
To: Animal Welfare Submissions
Subject: April 2016 regulations consultation

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

*Sincerely,
Micah Dash*

From: Elizabeth Kendal Riches s 9(2)(a)
Sent: Sunday, 8 May 2016 2:59 p.m.
To: Animal Welfare Submissions
Subject: Consultation on proposed animal welfare regulations

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

*Yours faithfully
Elizabeth Kendal-Riches*



New Zealand Thoroughbred Racing Inc. (NZTR)

Submission to The Ministry of Primary Industries

Proposed Regulations for the Transport of Live Animals from New Zealand

And

Proposed Animal Welfare Regulations (Care & Conduct and Surgical & Painful Procedures)

1.0 Introduction

NZTR welcomes this opportunity to submit to the Ministry of Primary Industries on proposed Animal Welfare Regulations.

NZTR is supportive of proposed Regulations under the Animal Welfare Act.

Participants in the equine racing industries in New Zealand (trainers, owners, breeders, riders, stable-hands, farriers, vets, float drivers and other participants) have a huge vested interest in maintaining robust animal welfare regulations.

2.0 Executive Summary

Before drafting a submission, NZTR sought advice from experts on issues covered by the proposed regulations and reviewed its Horse Welfare Guidelines and The Rules of Racing (both available to view at www.nzracing.co.nz) to check alignment with proposed regulations.

With a shrinking thoroughbred population in both racing codes and an associated increase in bloodstock values there are now higher expected standards from trainers, owners, breeders and officials around equine health and welfare. This has led to more veterinary involvement in some areas of care and welfare where there had been lay people carrying out some veterinary procedures. Coupled with this there has been recognition that veterinary involvement carries added benefits.

There are 12 proposed regulations relevant or specific to horses.

Comments are submitted on each relevant regulation.

More detailed comment and recommendations are submitted on equine dentistry, equine rectal examination and the caslick's procedure.

Greg Purcell
Chief Executive
New Zealand Thoroughbred Racing
106-110 Jackson Street
Petone 5013

s 9(2)(a)

Proposed Regulations for the Transport of Live Animals from New Zealand

NZTR complies with the International Federation of Horseracing Authorities (IFHA) Transportation Welfare Guidelines.

The IFHA, in its role to promote good regulation and best practice internationally across horseracing, recognises the central role played by the horse itself and so the importance of its welfare. The Federation formed the IFHA Animal Welfare Committee in 2010 and implemented a number of broad principles of racehorse welfare to be adopted by the Federation's members into more detailed outputs to assure racehorse welfare.

The Animal Welfare Committee plays a leading role in promoting overall welfare of the thoroughbred horse however the transportation of thoroughbreds is a specific area of risk that requires special attention by the industry. Accordingly the IFHA International Movement of Horses Committee (IMHC) published principles and guidelines to specifically promote the safety and welfare of thoroughbred horses during transportation for training, competition and breeding purposes.

The following areas of welfare are covered:

1. respiratory disease particularly shipping fever (pleuropneumonia) which is a significant problem associated with the transport of horses and has been reported to occur in up to 12% of horses transported by road and up 30-40% of horses transported by air
2. fighting among horses/ provision of adequate space
3. nursing foals including the minimum age that foals can be transported
4. the high centre of gravity of horses - horses have a relatively high centre of gravity and carry 60%+ of their body weight on their forelimbs. transport of horses is likely to be more tiring to horses than most other species because of uneven load distribution and the need for horses to constantly brace and adjust their position in response to vehicle movements.
5. thermoregulation especially at high temperatures, high humidity and in poorly ventilated areas
6. the stress of isolation, a significant source of stress for herd animals such as the horse and its effect on immune suppression
7. dehydration
8. inadequate rest periods
9. the impact of disease transmission during transportation on welfare
10. management during control post stopovers

Ministry of Primary Industries' standards detail the care that must be given when horses are transported off shore, either by air or sea. Animal Welfare Export Certificates (AWECs) set out these standards of care and how welfare activities are measured. In addition to generic international guidelines by a number of international bodies such as IATA and the OIE, New Zealand Standards have been negotiated with those who transport horses by sea and air from New Zealand. These detail the planning, reporting, competence of grooms and requirements relating to the care and welfare of horses in transit.

NZTR supports proposed regulations for the transport of live animals from New Zealand.

Proposed Animal Welfare Regulations (Care & Conduct and Surgical & Painful Procedures)

1.0 NZTR Animal Welfare Overview

NZTR applies animal welfare, with the support of the Racing Integrity Unit (RIU), through its Horse Welfare Guidelines and The Rules of Racing.

In 2011-12 NZTR reviewed its welfare needs and, as a result, started to introduce stronger welfare standards and practices.

The number of horses leaving Thoroughbred racing each year and requiring new homes averages 803¹. Once horses leave the racing industry they are no longer within the industry's jurisdiction and this presents a challenge. In response NZTR launched the Thoroughbreds in Equestrian Sport (TiES) programme in 2013 and Mandatory Horse Retirement Notification in 2014.

In 2015 and 2016 NZTR's priorities for horse welfare have been:

1. enforcing Mandatory Horse Retirement Notification
2. completing development of an online Equine Injury Database with Waikato University to identify the frequency, type and outcome of racing injuries and fatalities and serve as a data source to help improve safety and prevent injuries
3. establishing stronger links with re-homing providers
4. building on the TiES partnership with Equestrian Sports New Zealand (ESNZ);
5. strengthening its Prohibited Substance Regulations
6. continuing to audit all jumping venues annually and all incidents, with the RIU, to ensure appropriate safety and welfare policies are in place
7. supporting NZ Racing Board funding of up to \$250,000 per annum for equine research and development by the NZ Equine Trust
8. providing \$22,000 of funding to the NZ Equine Research Foundation and \$7,000 of funding to the NZ Equine Health Association for equine health and welfare research
9. working with the NZ Equine Health Association to reach full signatory status on the Government-Industry Agreement on Biosecurity Readiness and Response

2.0 Proposed Regulations

Regulations 14 & 15: Whips and Injuries from equipment such as halters, head ropes, and saddles

NZTR advises the current Rules of Racing, specifically Rule 638 (Running Races) and Rule 801 (Serious Racing Offences) together with *Guidelines with Respect to Acceptable Use of the Whip*, NZTR Directive *Na Whip*, and full signatory status of the Article 11 B (*Minimum Standard Guidelines On Use Of The Whip*) of the International Agreement for Breeding, Racing and Wagering are all in alignment with the proposed regulations on whips.

¹ Average microchip returns covering the 10-year period from 1 August 2004 to 31 July 2014

NZEVA Policy 10a states *Excessive or incorrect use of a whip on any horse, including the whipping of horses unable to improve their performance or their position in a race field, is not condoned.*

Proposed regulations covering injuries from equipment such as halters, head ropes, and saddles strengthens the minimum standards of the Code of Welfare (Horses and Donkeys).

NZTR supports both these proposed regulations.

Regulation 16: Tethering requirements

The regulation will require tethered horses to have constant access to water, food, and shelter. Tethering is not generally practised in racing for long periods of time; only while saddling, shoeing and grooming.

In the code 'tethering' refers to securing a horse for the purpose of grazing. This is different from 'tying up' a horse for management purposes such as grooming or attention by a farrier.

NZTR supports this proposed regulation.

Regulation 51: Hot branding

This bans hot branding. Since the introduction of freeze branding using liquid nitrogen there has been no need for the continuation of hot branding and NZTR is not aware of any foals being hot branded.

Rule 407 of the Rules of Racing specifically refers to freeze branding: *'In order to be eligible for registration, a horse must be: ...freeze branded...'*

NZTR supports this proposed regulation.

Regulations 52 & 53: Embryo Collection and Artificial Insemination

These procedures are not relevant to Thoroughbreds because both procedures are expressly banned under the International Agreement for Breeding, Racing and Wagering to which NZTR is a full signatory (Rule 407 in The Rules of Racing).

Regulation 55: Equine Dentistry

Many procedures previously and currently carried out without pain relief are no longer acceptable. It is recommended regulation of certain procedures and methods would prevent unnecessary pain to horses.

a) Equine Dental Technicians (EDTs)

Currently there is no regulation in New Zealand as to who can call themselves an equine dental technician (EDT). There is no standardised level of qualification ratified that they must attain before starting work as an EDT. This makes it very difficult to say who can and cannot carry out

certain procedures among the lay profession, other than to regulate for veterinary required and non veterinary required.

The availability of a new oral sedative paste called Dormosedan gel has led to an increase in EDTs performing various surgical procedures in New Zealand without veterinary assistance. Dormosedan gel can be purchased under prescription from a veterinarian. The licence for this product does state that when used for equine dentistry, only basic dentistry using manual tools is permissible.

Any veterinarian who is prescribing this drug for equine dentistry must try to ensure the terms of licence are not being broken. It is our understanding that the terms of the prescription licensing for this drug are potentially being broken by EDTs.

Regulation will strengthen the ability of veterinarians to ensure that painful procedures are not being carried out under inadequate pain prevention protocol.

NZTR has not identified any relevant NZ Equine Veterinary Association (NZEVA) policies to define EDTs and the work they are permitted to carry out. NZTR supports regulation of EDTs in New Zealand.

b) Manual Dentistry Tools

NZTR strongly recommends that only manual dentistry tools are used by non-veterinary dental technicians; i.e. no power tools. Power tools can cause over reduction of teeth, overheating of teeth and exposure of pulp structures. Currently it is advised the majority of EDTs currently use manual tools for most of their dental work. Some would use power tools occasionally for certain circumstance and only a small few would use power tools as their main equipment.

NZTR advises that preventing the use of power tools to EDTs would not significantly affect their ability to carry out their current work.

In the UK, only EDTs qualified under the British Equine Veterinary Association equine dentistry certificate, and veterinarians, are allowed to use power tools. They must be used only on a sedated horse under veterinary supervision.

NZTR supports equivalent regulations in New Zealand.

c) Incisor Alignment

The practice of incisor alignment by cutting the occlusal end of the incisor teeth to the same level with high-speed rotary tools should not be permitted. There is no valid scientific reason for this procedure, which carries significant risk of multiple tooth death, as a result of pulp exposure. This procedure is currently being carried out by EDTs in NZ. Australian veterinarians have had major problems with EDTs performing this procedure. They have had numerous cases of horses suffering painful consequences. Equine dental Veterinarians do not advocate cutting incisors, canines or any other teeth for reduction purposes.

Any manual equine dentistry tool should not be used in a way likely to cause damage to dental or surrounding soft tissue structures. No manual dental instrument should be used to cut, chip or shear any tooth. Pulp exposure or fracture is a high risk with these procedures and can result in serious consequences including death of the animal.

d) Tooth Extraction and Endodontic Procedures

All equine dental extractions should be performed by a Veterinarian or Veterinary student under direct supervision. It is essential that correct pain relief be used for all procedures. In general, all dental procedures involving below the gum-line should be performed by a veterinarian.

It is understood by NZTR that some EDTs are performing extraction of equine teeth. This includes incisor, canine, wolf and cheek teeth. Most EDTs would not perform these advanced procedures. It certainly would not represent a large proportion of their work. Recent evidence has shown techniques used for tooth extraction by EDTs are poor. Little attention is placed on pain relief and tooth fracture without follow up has been reported.

There are currently no Regulations mandating the above recommendations.

e) Deciduous teeth or caps

Deciduous incisors or cheek teeth that are so loose as can be removed by the fingers would be permissible for a non-veterinarian to remove. In all other cases sedation and extraction by a veterinarian is required.

Wolf teeth extraction is a one off procedure in a horse's life at around 2 to 3 years of age. In most circumstances it is still a significant tooth extraction requiring the careful stretching and tearing of the periodontal ligament before removal. At a minimum NZTR recommends all horses must be sedated and local anaesthesia used before extraction of these teeth.

Under all definitions it is an act of veterinary surgery and therefore should only be done by such a person. We do recognise that there are a large number of horses, which would require this procedure every year in NZ; and that there may be an issue with having sufficient vets with expertise in this area to cover such a demand. It is therefore a possibility that an exception to the extraction and gum-line regulation may be made to allow some EDTs to perform the procedure under direct veterinary supervision. Sedation and local anaesthesia would be required for all such procedures.

f) Endodontic procedures

Equine endodontics is considered by veterinary specialists to be one of the most difficult of all, due mainly to the complex tooth anatomy. Currently there are a small number of EDTs carrying out equine endodontic procedures. It is not known how successful their procedures have been. However as no veterinarians in New Zealand are currently trained in such procedures, the EDTs would not have been observed by anyone with sufficient knowledge to judge at the time. (Dr Ian Dacre, a NZ Veterinarian is trained in endodontics but does not currently reside in NZ)

As endodontics are a highly specialised area of equine dentistry, NZTR recommends that this should be regulated as a veterinary only procedure.

Further, NZTR supports reservation of the term 'Equine Dentist' for a veterinarian with a specialist qualification such a Diplomat or Fellowship level. Although the public may refer to lay equine dental operators as equine dentists, it is correct at government level that they are referred to as Equine Dental Technicians.

Regulation 73: Blistering, Firing or Nicking

Surgical procedures prohibited under section 21(2) of the Animal Welfare Act include blistering, firing and nicking.

NZTR supports the proposed regulation.

Regulation 74: Tail Docking

NZTR supports the proposed regulation.

Regulation 75 & 76: Rectal Examination

Rectal examination in an equine breeding use is carried out to allow palpation and hand held probe ultrasound examination of the internal genitalia. This is used to determine the stage of reproductive cycle when determining optimum time of service, pregnancy diagnosis, twin crushing etc.

Rectal examination is quite routine in other aspects of equine veterinary practice as required as part of a clinical examination for certain conditions, e.g. a horse presenting with colic symptoms.

NZTR understands there are now very few lay people in the country carrying out this procedure.

Policy 10f of the NZEVA maintains that *examination of the horse per rectum either by manual palpation or ultrasound should be considered a significant surgical procedure and should only be performed by veterinarians.*

NZTR advises the welfare and safety of the broodmare, operator and assistants require this procedure to be done by an experienced person who is aware of the anatomy and physiology, and is readily able to recognise pathology, has an understanding of the risks of the procedure and has an understanding of the use of chemical restraint; in practical terms a veterinarian.

The risks associated with the rectal examination of broodmares are well documented with of course rectal rupture always on the mind of any veterinarian carrying out this procedure.

Mares are not always accepting, young maiden mares especially carry higher risk. Sedation is often a requirement in such cases and again requires the possession of RVMs and an understanding of their administration and use. Over the years there have been a number of injuries associated with broodmare work in a crush.

The introduction and use of the modern tranquillisers into veterinary practice have done much to reduce this risk of injury to horse, operator and associated assistants. The safe use of these for horse and operator require some understanding of their pharmacology and effects.

The number of rectal examinations required per cycle is reduced when carried out by an experienced operator as the assessment of optimal time of service is better understood, reducing the number of times a mare is exposed to this procedure obviously reduces the risk.

There appear at present to be 3 or 4 lay operators across the country performing ultrasound rectal examination of broodmares.

NZTR supports the proposed regulation.

Regulation 77: Caslick's Procedure

The caslick procedure involves local anaesthetic being infiltrated at the skin/mucosal border of the proximal vulva. A thin sliver of tissue is removed and the created wound is sutured. Sutures are removed at ~10 days, the vulva effectively heals and remains closed until an episiotomy (caslick opening) is performed prior to foaling or for a further natural service. The procedure effectively reduces issues created by a pneumovagina an issue related to anal/vulval shape related to conformation and age induced shape changes.

Veterinary opinion is united that primary caslicking is a surgical procedure and should be vet-only. The rationale being that a brood mare which is caslicked many times throughout her life inappropriate cutting of the tissue in initial procedures can influence the ease with which the vulva can be sutured in consequent repairs over the years.

The grey area is that in a large, commercial thoroughbred stud a very experienced stud employee might repair a caslick, with a couple of sutures; the justification being that it saves a veterinarian returning to the stud at an inconvenient time. NZTR advises this is not sufficient reason.

Caslicking procedure obviously requires the possession and use of Restricted Veterinary Medicines (RVMs), at least local anaesthetic and potentially sedation for a fractious mare thus would have to require a Veterinary Operating Instruction (VOI) at least.

NZTR supports the proposed regulation.

Regulation 78: Castration

NZTR supports the proposed regulation.

Provided by e-mail to AnimalWelfareSubmissions@mpi.govt.nz

From: Stephanie Lane s 9(2)(a)
Sent: Tuesday, 10 May 2016 3:53 p.m..
To: Animal Welfare Submissions
Cc: s 9(2)(a)
s 9(2)(a) NZ Vegetarian Society; s 9(2)(a) NZ Vegetarian Society Inc;
s 9(2)(a)
Subject: Submission on Animal Welfare Regulations
Follow Up Flag: Follow up
Flag Status: Flagged

To the Ministry of Primary Industries

Please find the submission from the NZ Vegetarian Society on the regulations released for consultation in April 2016:

We believe you have not allowed sufficient time to adequately consider the issues raised. The documents are over 100 pages long and contain numerous changes involving all factory-farmed animals, bobby calves, live exports and animals in rodeo. These cannot be reflected and commented on in only five weeks. The consultation process is expected to be in good faith and we don't believe this is.

The Parliamentary Counsel Office's guidelines on the subject state that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. It states that "The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh".

We request that the decision making process is started afresh and allows sufficient time to each issue.

Stephanie Lane, BVSc
National Manager
"NZVS Approved" Manager

NZ Vegetarian Society
National Office
PO Box 26664, Epsom
Auckland 1344
www.vegetarian.org.nz



NZ
VEGETARIAN
SOCIETY

FOR A KINDER,
HEALTHIER
WORLD



1423

From: James, Rochelle s 9(2)(a)
Sent: Wednesday, 11 May 2016 9:38 a.m.
To: Animal Welfare Submissions
Subject: My submission

Follow Up Flag: Follow up
Flag Status: Flagged

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision- making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Regards,
Rochelle James

s 9(2)(a)

[Redacted content]

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1424

From: michaela_phil crutchley s 9(2)(a)
Sent: Wednesday, 11 May 2016 9:48 a.m.
To: Animal Welfare Submissions
Subject: submission

Follow Up Flag: Follow up
Flag Status: Flagged

To the Ministry of Primary Industries,

This is my submission on the regulations released for consultation in April 2016. I do not believe you have allowed sufficient time for me to adequately consider the issues that you have raised. The consultation documents number well over 100 pages, and there are a significant number of changes that need to be analysed. I do not believe your consultation process has been in good faith.

I bring your attention to the Parliamentary Counsel Office's guidelines on the subject, detailing that consultation must be genuine, in good faith, and provide sufficient time to properly consider the issues. In particular, it states:

"The party obliged to consult while quite entitled to have a working plan in mind, should listen, keep an open mind, and be willing to change and if necessary start the decision making process afresh"

I request that you start the decision- making process afresh, giving ample time to each issue. It is not possible to consider the fate of all factory-farmed animals, bobby calves, animals in rodeo, and live exports in five weeks.

Regards

Michaela & Phil Crutchley

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Amelia Rogers s 9(2)(a)
Sent: Wednesday, 11 May 2016 2:11 p.m.
To: Animal Welfare Submissions; n.guy@ministers.govt.nz
Subject: Appoint a Commissioner for Animal Welfare

Follow Up Flag: Follow up
Flag Status: Flagged

Dear minister,

RE: ANIMAL WELFARE

I write to ask that the Government create a new position of Commissioner for Animal Welfare and resource the position so that its functions can be properly fulfilled.

The following are the reasons I consider it is essential for New Zealand to introduce a Commissioner for Animal Welfare –

1 Ministry for Primary Industries has a conflict of interest between its animal welfare responsibilities and its key purposes

At present, primary responsibility for enforcement of animal welfare in relation to farm animals rests with the Ministry for Primary Industries. This is unsatisfactory, as it places the ministry in a position of conflict vis-à-vis its primary purpose, which is to support and increase exports.

The homepage of MPI's website demonstrates this: it does not mention animal welfare -

“Our vision is to grow and protect New Zealand. We do this by maximising export opportunities for the primary industries, improving sector productivity, increasing sustainable resource use, and protecting New Zealand from biological risk. MPI is the ministry formed from the merger of the Ministry of Agriculture and Forestry, the Ministry of Fisheries and the New Zealand Food Safety Authority. MPI is positioned to deliver high-quality services and support to the whole of the primary sector.”

The Ministry's primary role is accordingly in conflict with its animal welfare responsibilities as, in the short term, it is beneficial to exports to disregard animal welfare and produce farm products at the cheapest-possible price. It places MPI in a difficult position to be investigating and prosecuting farmers when it is also working with them to increase exports. An independent Commissioner for Animal Welfare whose sole

over-damning-bobby-calves-report-video-6451915. There will continue to be further revelations and embarrassment for the Government and the country until action is taken.

On 1 April 2016, there was a fire in a Waikato piggery – Brien Farms in Hopuhopu. At least 50 pigs burned to death. This is either the third or fourth fire on this pig farm. In August 2015, 400 mother and baby pigs were burned to death in a blaze at the same farm. In 2005, up to 300 animals were burned to death. Burning to death is one of the most horrific and painful ways of dying. The pigs who died suffered fear and agony. The fact that this is either the third or fourth time this has happened at this farm demonstrates that something is seriously wrong.

I was very perturbed by the television story about this event, which said that the Ministry for Primary Industries would visit the site next week to check whether there were any animal welfare issues. The fact that hundreds of pigs have repeatedly burned to death clearly demonstrates that there are animal welfare issues. I find it incomprehensible that MPI staff did not travel to the farm on Friday so that they could inspect the site as soon as the Fire Service advised that it was safe to do so. Giving a number of days of advance notice to farmers of an inspection simply gives them an opportunity to temporarily remedy animal welfare issues so that MPI does not obtain an accurate picture of normal practices on the farm.

6 In other countries, pro-active steps are being taken to improve animal welfare. In Israel, for example, this year cameras are being installed in all slaughterhouses to try and prevent the repeated animal abuse revealed by covert filming in Israel. New Zealand should do this too. This country's lack of action means it is slipping further and further behind other countries in relation to animal welfare, which will increasingly jeopardise New Zealand's export earnings from agriculture as consumers in other countries become increasingly conscious and concerned about animal welfare.

7 New Zealand's aim should be to brand itself internationally as Number One in the world in terms of animal welfare.

New Zealand could sell its exports at a premium if it could certify that animals were not cruelly treated during production. This would also complement the country's clean, green image, with environmental purity adding value to the animal friendly brand, and vice versa. That is not what happens at present. Instead, each minor concession on animal welfare occurs very slowly and often a long time after other countries have already acted.

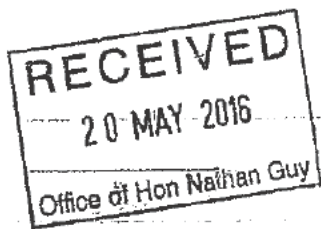
Commissioner for Animal Welfare

New Zealand would be following in the footsteps of European nations in appointing a Commissioner for Animal Welfare.

Yours faithfully,

Amelia Rogers

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982



David Tuart

s 9(2)(a)

Animal Welfare Policy Team
Ministry of Primary Industries
Pastoral House
25 The Terrace
Wellington.

Dear Sirs,

This letter could be regarded as a submission about changes to the Animal Welfare Act of 1999 but it covers a broader spectrum of legislation so could also be regarded as a general submission. This is specifically about:

1. The Wildlife Act of 1953
2. The Animal Control Act of 1977
3. The Animal Welfare Act of 1999
4. and the Rio Convention.

I have spoken to s 9(2)(a) who is on the Animal Welfare Policy Team and he has suggested that the Team will look specifically at the welfare of newborn Calves on Dairy Farms etc. while I am suggesting they need to look at the inhumane treatment of Cats and also where three Acts come into conflict with each other and with the Rio Convention which New Zealand is signatory to

Two of the Acts predate the signing of the Rio Convention and take no regard of it and pay no respect to the Animal Welfare Act so that the SPCA can be convicted for liberating Noxious Animals by the Department of Conservation and the SPCA can prosecute DOC for cruelty by their Government Shooters.

Under the Rio Convention rules every signatory Country must preserve every Species, Gene Pool, and Life form, of Life on Earth, that is Endemic to that Country, equally, whether it be Indigenous, Native, or Exotic; but DOC who are the Custodians of our Wildlife do not do that. They are obsessed with killing all Animals that they say are 'Not Native' (meaning Indigenous) and give the reason as being that the Animals they kill are harming or killing Native (meaning Indigenous) Species.

The reason they say and do these things is mainly traditional and because they can draw funding from the Government for so doing.

Specifically though, they say Exotic Animals kill Indigenous Animals. Often, the Exotic Animals they kill are actually beneficial to Indigenous Ecosystems and should be termed 'Native' Species but are in fact termed 'Noxious' and 'Threats'.

To make sense of what I am saying I will give an example:

The now extinct Moas (Ratites) were the mainstay of Indigenous Ecosystems with 14 Species and Subspecies that ate all over abundant shrub and minor tree Species.

When Moas became extinct the Ecosystems went out of kilter because sunlight could no longer penetrate to the ground and the wonderful and prolific profusion of Wildlife could no longer flourish.

Wild Sheep were introduced to New Zealand. They were the only Animal that could duplicate the feeding habits of Moas. For a time, where there were Wild Sheep the Ecosystems began to flourish as sunlight was again able to penetrate to the ground.

And then during the 1960s the Government Shooters began to run out of Deer to shoot.

^{s 9(2)(a)} who ran the Wildlife Service consulted with his Wildlife Biologist ^{s 9(2)(a)} ^{s 9(2)(a)} advised ^{s 9(2)(a)} to stop the

Government Shooters from shooting Deer and put them onto killing Possums, Rats and Mustelids.

Major liked killing Deer and he did not like ^{s 9(2)(a)} because he was an American, so he sacked ^{s 9(2)(a)} and told the Government Shooters to shoot Wild Sheep.

If New Zealand had good sensible Laws that would never have happened New Zealand is the only Country in the Developed World that does

not have a Gene Bank where rare⁴ and endangered Animals can be put to keep them safe. Also New Zealand is the only Country that does not have hunting laws. This makes New Zealand a Banana Republic.

Beginning in 1701 when Welsh Whalers brought Aran Sheep to the Marlborough Sounds, several Flocks of Wild Sheep were brought from the Hebridean Islands and Wales. These Sheep became extinct worldwide except in New Zealand so should be protected under the Rio Convention. DOC are the custodians of our wildlife so should be protecting the Wild Sheep but due to an absence of good law they are shooting these Sheep because they can draw Government funding to do so. Some are already extinct.

The Welfare Policy Team should look first of all at preventing the Government from funding Government Shooters. If the population of Animals such as Deer are above optimum in any area the Deerstalkers Association would be only too willing to shoot them if told where they are. Most Wild Animals can be more effectively and efficiently live captured than shot if it is done by the right people.

Under the three acts, various Government Departments become laws unto themselves

and this is evident to the Public who consequently do not respect the Law. It would be best to repeal the three sets of legislation and draft one set of legislation that all of the Government Departments use so they can work together to achieve common goals and have the support of the Public.

Also the Animal Welfare Policy Team must bring into this equation the SPCA, City Councils and Police.

At present, the SPCA are a sort of voluntary organisation that rely on donations for funding and there are at least three other organisations separate from them or in conjunction with them that do the same thing. None of them have any legal qualification yet they are able to administer the Animal Welfare Act and even stand above the Police. This is a topsy turvey situation and the Police do not want to have anything to do with it. The whole Act doesn't work.

If the Public knew exactly what the SPCA use their donations for I do not think they would donate.

The SPCA should not have any legal power to administer the Animal Welfare Act because any sort of nutter can walk in off the street and get a job with the SPCA as an Animal Inspector.

If anyone working for the SPCA wants to enter a premises they should be required to do so

6
with a Policeman appointed by a Senior Sergeant who is in total control just as if the SPCA did not exist.

The SPCA in Rotorua was formerly run by ^{s 9(2)(a)} [REDACTED] who was highly respected. If she had a problem with an animal she would ask for my advice. She found that people working for the SPCA on wages were mistreating Animals and leaving actual work for volunteers to do. She remonstrated with the employees, who held a democratic meeting, and ejected Nicola. Since then the Rotorua SPCA have refused to take in most of the unwanted Cats.

In Tauranga the SPCA advise people with unwanted Cats to take them out into the Bush and leave them there. This constitutes liberating a Noxious Animal and is cruel to the Cat. And it is illegal.

In Rotorua there are two Women who take in large numbers of Dogs, Cats Roosters, Rabbits and Horses that people do not want to take to the SPCA because they do not like the Rotorua SPCA because of the people who work there. Now, this would not happen except that the Animal Welfare act supports the status quo.

Much of the problem with the SPCA is also caused by the Law under which City Councils operate and this should be

also looked into by the Animal Welfare Policy Team.

Dogs and Cats are similar predators and breed prolifically, so that there is no rare and endangered Breed of Cat or Dog worldwide that is rare or endangered.

There are about a million too many Dogs in New Zealand that are not well cared for and the Rotorua City Pound staff shoot 20 Dogs each fortnight that are unwanted or abandoned. The reason this situation exists is that Dog Breeders make a lot of money selling pups. If the registration fees for registering Dogs was raised all the problems would not exist.

Cats are the same problem as Dogs but under existing law Councils have nothing to do with Cats. They deal with Dog, Sheep, Horses, Fowls, Goats, Donkeys and Llamas but not Cats. That is ridiculous. There are more unwanted Cats in New Zealand than any other Animal. More starving miserable Cats, and Cats kill more indigenous Birds than all of the predators including Humans yet Councils do not have anything to do with Cats.

Some Cat Lovers collect Cats from the SPCA and put them in Bird Sanctuaries and Public Parks and feed them there, and people with unwanted Cats

contribute more Cats.

You have to change the law so that Councils must register and chip all Dogs and Cats the same, and charge such a high fee that people will keep Rabbits instead. Or any sort of Herbivore. Especially Dogs and Cats that have not been desexed.

By doing away with the Dog and Cat problem, and the Animal Welfare act, then the SPCA would be manageable and Councils would only need to worry about Roosters that wake people up too early in the morning.

Councils should make a profit out of Dogs and Cats and not make them a burden on ratepayers.

I am enclosing separate papers about these things.

What the Animal Welfare Policy Team have to realise is that there are systemic problems and just amending the Animal Welfare Act won't change these problems and the greatest Animal Cruelty is not caused by Farmers mistreating Calves.

Yours Faithfully,

David Luard



Animal welfare proposed regulations feedback submission form

Your name: Kathy White

Your organisation (if applicable): _____

Your contact details: _____

Your feedback: _____

1. MPI ~~do~~ provide a valuable service to our country however your time and energy should be put to more important issues than pure bred dogs.
2. I have owned purebred dogs since 1973 and a docked breed since 1949 docking my own pups since 1983 now using the banding method.
3. I have never had a situation with the 100's of pups I have docked and removed dew claws on where the pup shows stress or infection.
4. As a breeder of hunting dogs I receive orders from hunters from all over the world wanting a docked pup due to the damage hunters in other countries are experiencing with the tails / dew claws
5. Lambs are docked + neutered at an age when all nervous system is developed and often when the lambs are ~~to~~ grown, this is cruel. It is not cruel to ~~remove~~ band tails remove dew claws on a pup under 3 days (age 1 use)

Feel free to continue your submission on additional paper and staple it to this form.

Please place your feedback inside the feedback box. Alternatively, take this form with you and post your feedback to Animal Welfare Policy, Ministry for Primary Industries, PO Box 2526, Wellington 6140.

You can also email your feedback to animal.welfaresubmissions@mpi.govt.nz

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19/05/16

1428

Animal Welfare proposed regulations feedback submission form

BARBARA HYDE

s 9(2)(a)

My feedback:

62. The proposed regulation states: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

Must only be performed for therapeutic reasons

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

I am a member of the New Zealand Kennel Club (NZKC) and am a registered breeder of pedigree dogs.

I am an accredited member of the New Zealand Council of Docked Breeds (NZCDB) and have had my animal husbandry skills signed off by a veterinarian, who must complete my application for accreditation by either witnessing neonate puppies being banded or being in the presence of another accredited bander to enable me to perform tail shortening.

The NZCDB as an organisation was established in 2004 and our membership is focussed on the welfare of tail shortened breeds. We operate as a fully audited and regulated group under the umbrella of the NZKC with the approval of the National Animal Welfare Advisory Committee (NAWAC).

I have never had a complaint or issue arise from any litter that I have completed banding on and to the best of my knowledge I understand that as an accredited group, we have performed tail shortening on over 10 500 neonate puppies without incident since 2005.

I am of the understanding that the procedure of tail banding (described by the NAWAC approved scheme) is vastly different from the process of tail amputation and as an accredited bander I only perform the tail banding procedure under the Animal Welfare Act (No2) 2015 and this is not a surgical procedure.

The breeds that I am associated with and that are banded by me are traditionally docked dogs that still perform their duties that they were designed for.

I understand that in 2012 NAWAC agreed and suggested a study should be completed to dispel any myths around the process of tail banding, yet to date, this has not been carried out by NAWAC so I am surprised that this proposal has taken shape.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

I understand that over 170 countries do not ban the tail shortening procedure however these countries are not spoken about in any documentation produced by MPI.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely

involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKCC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for tail shortening.

I am of the belief that there is currently a process in place for the SPCA to act on individual cases that perform a tail shortening procedure illegally on a litter of non-registered NZKCC members neonate puppies, however in the last 4 years I only know of 2 cases where the SPCA has acted on this information.

61. The proposed regulations states: Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian;

Must only be performed for therapeutic reasons; and

Pain relief must be used at the time of the procedure

Hind limb dew claws: non-articulated (greater than or equal to four days of age)

Must be performed by a veterinarian or veterinary student under supervisions; and

Pain relief must be used at the time of the procedure.

I disagree with this proposal in its entirety and advocate for the status quo and these are my reasons:

When performing a dew claw removal, I complete this process in a neonate puppy 4 days of age or under. At this

time it is a well-recognised fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone (has not calcified) and does not bleed when performed correctly.

No other country in the world has proposed this procedure should not be practiced as the health and welfare of the dog will be compromised.

As a professional dog breeder and caretaker of my chosen breed, I am fully versed in the damage that a dew claw can cause to the dog if left on. My chosen breed has been bred to be used in its traditional purpose and the dew claw if left on would result in significant pain and suffering to the dog.

I understand that breed specifics are not taken into account when this proposal was documented and the groups largely involved in writing these have dealings mainly with crossbred non-pedigree (no registration with the NZKC) dogs. I would sincerely question the stakeholder's ability to answer such detailed questions around form and function of a specific breed for the purposes of this proposal.

I understand that another major stakeholder is an offshoot of the RSPCA namely HUHA. This group also deals with crossbred non-pedigree dogs yet they felt qualified to once again offer their opinion on pedigree dogs and the reasons for dew claw removal.

I understand that MPI partly funds both the RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which I see as being extremely one sided and is not factual. I also understand that the governing body of the professional dog world Namely the NZKC has over 6000 members, but NZKC were not included as a major stakeholder when writing these proposals and nor are they funded by the Ministry.

In my profession as a Groomer/Boarding Kennel facility I have witnessed many incidents of dew claws growing back into the skin of the dog as the pet owner doesn't understand how to trim the nails and often as the dog is of a coated variety, they are not aware of a dew claw being present.

I understand that not all front dew claws are articulated and once again the breed specifics have been ignored in this instance and MPI have been advised incorrectly.

I understand that the Groomers Association have not been contacted for information from their large membership to dispel the myths displayed in the proposed regulation and I further understand that the largest governing body (and only – NZKC) have also not been included in the proposal to not allow this process to remain as is.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Animal Welfare Policy
Ministry for Primary Industries
PO Box 2526
WELLINGTON 6140
Submitted by email: Animal.WelfareSubmissions@mpi.govt.nz

Rural Women New Zealand

Submission on animal welfare regulations (care & conduct and surgical & painful procedures)

Introduction

1. Rural Women New Zealand ('RWNZ') is a charitable member based organisation that reaches into all rural communities and advocates on issues that impact on those communities. We welcome the opportunity to comment on the Ministry for Primary Industries' ('MPI') discussion document on animal welfare regulations. The proposed regulations in this document will have significant impacts on our members, many of which own and care for farm animals and are also strong advocates for animal rights. The importance our members place on this issue is reflected in our organisation's core values on animal welfare, which are: it matters how animals are treated; we have responsibilities towards animals in our care and animals influenced by our activities; and using animals is acceptable as long as it is humane.

Overview of submission: effectiveness of regulations will be contingent on farmers receiving adequate government support on the ground

2. RWNZ support the overall intent of the proposed regulations. On the whole we believe farmers do care for their animals very well and ensure they do not suffer unnecessarily. However, we appreciate that under the current system minimum standards are not directly enforceable and that not everyone is meeting them. Our members are well aware of the damage that even isolated welfare incidents could do to New Zealand's reputation as a responsible agricultural producer.
3. That being said, we think that the effectiveness of the proposed regulations will be contingent on farmers receiving the 'on the ground' support they need to understand and achieve compliance. The list of proposed regulations is extensive and cuts across a broad range of farming contexts, practices and procedures. We note that some of the proposed regulations will involve substantial changes in farming practice as well as an increased reliance on veterinarian services which remain relatively scarce in rural areas. With this in mind we think it is essential that the regulations are accompanied by appropriate education, training and lead in times for farmers, along with efforts to increase the number of veterinarians in rural areas. We expand on these points below and provide our additional comments on the proposed enforceability and infringement regime.

RWNZ Submission on 'Proposed animal welfare regulations' (care & conduct and surgical & painful procedures)

Education and training for farmers will be essential to ensure compliance

4. It is essential that farmers receive adequate training and education on the regulations proposed in this document so that they have a thorough understanding of their compliance obligations as well as the penalties for non-compliance. While we appreciate that many of the proposed regulations clarify existing best practice, the list of proposed regulations is extensive. It is inevitable that there will be complexity involved in applying these to the real world and in different farming contexts. As noted in the document, some of the proposals will in fact involve substantial changes to current practice for some farmers. Farmers will need to be educated on these changes and to be given constructive ideas and workable solutions to adapting their practice.
5. Providing this education and training is a major undertaking and one which we believe must be led by the Government through MPI. Government leadership is vital to ensuring consistency and coherency of key messages and to securing support from farmers for these changes. MPI must be seen as part of the solution and to be actively collaborating and engaging with farmers and their representatives.
6. Educational resources should also be delivered in a way that is appropriate and acceptable for farmers. Content should be written in plain English and include ideas and solutions that are practical and workable on the farm. It is worth noting, that on many farms, it is often the women who are the information gatherers and disseminators for the farming operation. Education resources may also need to be adapted to support the increasing numbers of migrant workers coming to NZ farms – especially in the dairy sector. These workers bring with them their own cultural perspectives on animal welfare and may need to re-educate on what are acceptable behaviours towards animals on NZ farms.
7. It is vital that animal welfare inspectors are also given appropriate levels of training and experience before having powers of enforcement. One bad call by an animal welfare inspector could have serious implications for both New Zealand's trade reputation, as well as MPI's relationship with the farming sector.

The timeframes for implementation must allow adequate time for farmers to adapt their practice

8. Adequate lead in times should be provided to enable farmers with time to adapt their current practice. We think that the proposal in this document to implement regulation for young calf management by late July 2016 is unrealistic. We think that farmers, particularly those in more geographically remote areas, will need more time to adapt to these changes. Additional time may also be necessary for the Government to roll out the on the ground resources necessary to support farmers through these changes.

Further government investment is needed to increase number of veterinarian services in rural and remote areas

9. A large number of the proposed regulations, depend on farmers having ready access to veterinarian services. In particular, new rules around the types of surgical and painful procedures that must be carried out by a vet, include procedures that some farmers currently do themselves. The requirement for farmers to obtain veterinarian certification prior to transportation of certain stock is also likely to increase demand for veterinarian services. We are concerned that achieving compliance with these changes will be more difficult and onerous

for farmers in remote areas where access to vet services remains relatively limited. More government investment to increase the number of veterinarian services in rural and remote areas is necessary to address this. The Government may need to consider further investment into the rural veterinarian bonding scheme to encourage more vets to establish themselves in rural areas.

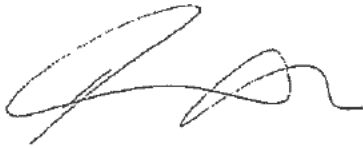
Concerns around enforceability of proposed low-level offences:

10. We think that there may be practical issues with the enforceability of some of the low-level offences proposed for inclusion in the regulations. As currently worded, many of these low-level offences require highly subjective decision-making on the part of animal welfare inspectors and appear difficult and costly to police with a low likelihood of detection.
11. For example, we think an animal welfare inspector would have real difficulty issuing an infringement for the proposed offence of 'twisting an animal's tail to cause pain'. We are not sure how an officer could be expected to distinguish between normal handling for restraining and moving animals and painful twisting as suggested by the paper. The likelihood of such an offence being reported also appears dubious. This is merely one example, however we think that similar issues can be identified with a number of the other low-level offences proposed.
12. We think that low-level offences which are difficult and costly to enforce in practice, may be better addressed through education and training that is targeted at achieving attitudinal change, as opposed to regulation. The goal should be to provide farmers with evidence-based education on the harmful and cruel nature of these types of practices, to invest in measures that promote long-term attitudinal changes and to provide farmers with alternative solutions and ideas that are practical and workable on farms.
13. We also do not support the proposal to make prosecutable offences resulting in criminal conviction, strict liability offences. We think that where there is a chance of criminal liability, it must be necessary for an element of men's rea (intention, knowledge or recklessness) to be established.

Animal welfare issues do not sit in isolation

14. As already discussed in this submission, RWNZ is a strong advocate for animal welfare and we support regulations to address issues with current non-compliance. At the same time, we think that the Government must acknowledge the wider factors contributing to this problem. Animal welfare incidents are very often a consequence of other stressors influencing farming operations. The complex demands of farming have become increasingly apparent in recent times, as evidenced by rising suicide rates amongst farmers. The types of stressors that can lead to animal welfare issues include, for example, a lack of knowledge on how to manage the farm during an adverse event, financial stress leading to inability to afford supplementary feeds and animal treatments (e.g. vet, vaccines, drenches etc).
15. Sometimes even the most experienced and professional farmer and land/stock manager, in today's competitive and uncertain environment, cannot afford to employ help so things get missed and easy solutions taken. Threats against family pets and farm stock can also be used as a form of domestic violence. There are anecdotal reports of farm women being manipulated to stay in relationships by threats that if they leave the farm, livestock will be harmed.

16. We would be pleased to discuss this submission with you and for the opportunity to present our views in person. RWNZ would also appreciate the opportunity to be involved in any future stakeholder workshops on the proposed regulations.



Penelope England
Chief Executive Officer
Rural Women New Zealand
§ 9(2)(a)

Acknowledgements to: Wendy McGowan, National President & Fiona Gower, Vice President & § 9(2)(a)
§ 9(2)(a) Land Use/Environment Portfolio.



Animal welfare proposed regulations feedback submission form

Your name: Michelle Gibson

Your organisation (if applicable): _____

Your contact details: s 9(2)(a)

Your feedback: Proposal 62. Dogs - Tail Docking

I do not agree to the proposed change by
MPI to not allow tail banding by breeders
under a quality assurance scheme as currently
is allowed.

Research shows (clearly) that the nervous system
in puppies under 4 days of age is not
fully developed so banding tails is not a
significant surgical procedure.

The current scheme whereby tails can be banded
under a quality assurance scheme has worked
in NZ - there have been no complaints & no
injury.

Feel free to continue your submission on additional paper and staple it to this form.

Please place your feedback inside the feedback box. Alternatively, take this form with you and post your feedback to Animal Welfare Policy, Ministry for Primary Industries, PO Box 2526, Wellington 6140.

You can also email your feedback to animal.welfaresubmissions@mpi.govt.nz

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Animal welfare proposed regulations feedback submission form

Your name: Michelle Gibson

Your organisation (if applicable): _____

Your contact details: _____

Your feedback: PROPOSAL 61. Dogs - Dew claws

I do not agree with the proposed changes
to only allow Dew claw removal for
injury or disease.

Properly done, there is no cutting through bone
• it is what the MPI seem to think this. There is no
pain as research shows the nervous system is not fully developed.
There is an issue of compliance - how are you going
to enforce this as it is a huge task to enforce.
All that will be penalised is NZKC members.

Dew claw removal in puppies under 4 days of age
is about prevention of future risk of injury.

Feel free to continue your submission on additional paper and staple it to this form.

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1432

Submission to the Ministry of Primary Industries in regard to the proposed animal welfare Policy changes.

I am Diane Riley an animal lover and carer. I with my husband run a boarding kennels and cattery called ^{s 9(2)(a)} [REDACTED] I take animal care very seriously. I also show and breed and Judge dogs. I have 2 sisters that are veterinary nurses that also support our view.

I wish to submit that I appose the proposed changes to section 62 Dogs – Tail Docking

Section 62 Tail docking.

I object to the proposed changes. And have to state that some of the reasons given under the heading "what is the problem" is absolute rubbish! Dogs with or without tails have balance! The removal of a tail at any age does NOT affect the dogs balance! You don't see sheep falling over in the field due to lack of balance either! And Dogs are more than capable of "expressing" themselves in many ways with or without a tail! Also the reasons given not to dock talks about the level of pain. There is no denying that their will be a small amount of pain initially, but this is very short lived if done by a reputable tail bander or vet. Or even someone who has been properly trained to do so. I have witnessed in the past litters of pups' tail docking and felt it was so quick and clean that the pups hardly noticed. They were settled back with their Mum and all was forgotten in no time.

Just because other countries do something does not mean we HAVE to follow! We are meant to be a democratic country and we should have freedom of choice to care for our pets as we see fit, provided we follow healthy and safe measures that minimise any possible pain. Most people that have docked dogs do so in a proper safe way. Why should this be changed? There have not been masses of dogs turn up at the SPCA with problems as a result of tail docking!!

I appose the proposed changes, and feel that the current regulations are more than adequate! I feel that these changes are only being proposed due to a very small number of people in the long distance past that did not carry out the procedure in a proper manner. Why should we all be subjected to a regulation when we were performing the procedure in a caring hygienic manner, and our dogs are happy healthy dogs just the same!

Submission to the Ministry of Primary Industries in regard to the proposed animal welfare Policy changes.

I am Diane Riley an animal lover and carer. I with my husband run a boarding kennels and cattery called ^{s 9(2)(a)} [REDACTED]. I take animal care very seriously. I also show and breed and Judge dogs. I have 2 sisters that are veterinary nurses that also support our view.

I wish to submit that I appose the proposed changes to section 61 Dogs Dew claws. I particularly object to the alleged "Problem" as I have witnessed the exact opposite from what is described. I have seen and had to care for many dogs that have injured, ripped and torn their dew claws causing much distress and pain as an adult dog.

In fact I categorically state that leaving the dew claws on is a hazard! At the time of writing we have a dog in our facilities that is on medication and has her leg bandaged due to a dew claw injury (was half torn off!)

I have for many years removed my puppies dew claws at 2 days of age and the pups settle down very quickly after the removal. They recover very quickly. The removal of dew claws at such a young age is much kinder than having it ripped and torn as an adult. I can also state that having had their dew claws removed has not affected their ability to eat bones and run and play. In fact I know they can do so without the worry of injury.

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11633

From: Angela Simpson s 9(2)(a)
Sent: Friday, 15 April 2016 8:27 p.m.
To: Animal Welfare Submissions
Subject: Horse and donkey welfare act.

Hi,

It's great to see an improvement for these animals.

Will this also cover rodeos? Dressage people who use cruel methods of teaching horses to overbend their necks?

The western riders who use similar methods?

How will this be monitored in rural areas where horses can be hidden from roads and the public eye or racing stables?

I want to see this welfare code work but fail to see how it can.

Regards Angela Simpson

Sent to R+A

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Out of Scope

From: Roger Beattie s 9(2)(a)
Sent: Friday, 15 April 2016 6:18 p.m.
To: Animal Welfare Submissions
Subject: Submission on animal welfare regulations

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam,

I read with interest that cattle tail docking is proposed to be forbidden except by a vet.
Yet you appear to be moving away from a 6 week maximum time limit for lambs to 6 months.

Why the inconsistency?

Do cattle feel more pain than sheep?

Pigs & dogs are also on the forbidden list, why not sheep?

I say that sheep are not on the forbidden list because our farmers, farmers organisations & MPI are living in yesterday's World.

There is no logical reason to tail lambs.

We own & run sheep & beef farms on Banks Peninsula (4,000 sheep) where we have not tailed a single lamb for 15 years.

Not only do we not tail we do not crutch our sheep, yet we have very few dags & very little fly strike.

It is worshipping at the alter of productivity that drives tailing.

It is selecting for survivability & ethical traits that mean we don't need to tail.

I urge you to visit one of our farms before to put these new regulations into force.

Regards

Roger Beattie s 9(2)(a)

s 9(2)(a)

From: Jason Singh [§ 9(2)(a)]

Sent: Saturday, 16 April 2016 10:31 a.m.

To: Animal Welfare Submissions <Animal.WelfareSubmissions@mpi.govt.nz>

Subject: Consultation on proposed animal welfare regulations

1435

It is obvious the MPI protects the interests of the meat & dairy industry. No submission will ever change that. That is why this submission is short and simple.

There is only one question that needs to be asked. Does the MPI think nonhuman animals deserve the right to live from institutional exploitation?

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Out of Scope

1436

From: David Fifield § 9(2)(a)
Sent: Thursday, 19 May 2016 4:46 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Submission.

Follow Up Flag: Follow up
Flag Status: Flagged

I wish to support the Griffon Bruxellois Club submission.

D J Fifield
§ 9(2)(a)

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1437

From: Je4nny Doyle s 9(2)(a)
Sent: Thursday, 12 May 2016 9:45 p.m.
To: Animal Welfare Policy
Subject: Re Lack of Public Consultation on AWA submissions

Follow Up Flag: Follow up
Flag Status: Flagged

Dear M.P.I,

I am astounded that that you have given the public so little time to consider the submission due next week.

There are so many issues at stake here, and you have not prepared the species codes separately over the year as was expected. I did not even know about the submission nor the consultation meeting in Palmerston North even though I was a submitter of the AWA last/previous year.

The changing of some non binding codes into legally binding regulations is a very important issue to me but I will not have time to prepare a worthwhile submission given the time frame.

Please extend the submission date or start the consultation process again.

yours sincerely
Jenny Doyle

Out of Scope

1438

From: Gareth Williams s 9(2)(a)
Sent: Thursday, 12 May 2016 4:13 p.m.
To: Animal Welfare Submissions
Cc: Rt. Hon. John Key; nathan.guy@national.org.nz
Subject: Submission on the Animal Welfare Act Review
Attachments: Tail Banding submission.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Best Regards

Gareth Williams

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To
animal.welfaresubmissions@mpi.govt.nz

John Key (john.key@parliament.govt.nz)
MP for Helensville

and
nathan.guy@national.org.nz

Animal Welfare Policy
Ministry for Primary Industries
PO Box 2526
Wellington 6140

12th May 2016

Submission on the Animal Welfare Act Review

Dear Sirs

As a NZ Kennel Club and Waikato Gundog Club member, and owner of a working gundog; I would like to put forward my submission.

I request that tail banding and dew claw removal of working gundog puppies by accredited practitioners continues to be allowed in NZ as is the current approved practice. The Accredited Banders Scheme is audited by the NZ Kennel Club to ensure compliance with agreed protocols and current Code of Animal Welfare.

Working gundogs with long whippy tails commonly injure their tails whilst hunting through heavy vegetation and thick brambles, where their fast tail action often leads to tearing and bleeding which is painful and extremely difficult to treat. Tails have poor circulation and often in Hungarian Vizslas (my specific breed) have very little coat to provide protection. This leads to poor chances of repair.

This is a repetitive injury that worsens every time the dog works. The only resolution for an adult dog suffering from chronic tail damage is a painful and traumatic amputation. Shortening the tail humanely at a few days old eliminates a huge risk of injury.

Similarly, dew claws can easily get damaged whilst hunting as opposed to being removed near birth.

The argument being put, that vets do not see many working gundogs with damaged tails, is flawed because most individuals of these breeds are currently docked thus preventing damage from happening.

So for the welfare of working gundogs in NZ, I ask that you consider this practice to be allowed to continue.

Thank you for taking the time to read this submission.

Yours sincerely

Gareth B Williams

Proposed Regulation 61. Dew claws.

Proposed Regulation 62. Tail docking

Proposed regulations 67, 69, 70, 72 and 81 – these procedures can be undertaken by any person (some may require training).

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From: Stephen Mulholland s 9(2)(a)
Sent: Thursday, 12 May 2016 9:38 a.m.
To: Animal Welfare Policy
Subject: Submission on Animal Welfare Regulations

Follow Up Flag: Follow up
Flag Status: Flagged

The following is my submission on the proposed animal welfare regulations.

21. Llama & Alpaca – Injuries from equipment such as halters, head ropes, and packs

Perhaps in this case defining "equipment" might be along the lines of "any fabricated device that is intended to be fitted to or placed upon a camelid". That would probably cover halters, pack saddles and cart-pulling harnesses, which seem to me to be the most likely issues. Possibly it could be added "or any device designed to restrain a camelid", which would apply to shearing tables and crushes/bales. There are a number of crush designs, especially for llamas due to their size, which you can find on the internet. I have heard that early on there were some health&welfare issues with some of the early crush designs, which have since been largely solved. But you never know if someone will try to "reinvent" a camelid crush (other other constraining device) without doing proper research, and thus repeat 20 year old mistakes!

22. Llama & alpaca – Companion animals

Proposal: "Camelids must be provided with a companion animal such as another camelid, sheep, or goat."

Camelids are very social animals, and must have suitable companions. We recommend that camelids usually be kept in groups of 3 or more, to ensure that good social connections will form, but I realize that this is more of an ideal that goes above a legislated minimal standard.

My concern is that a lone camelid placed with other animals (e.g. sheep) might form no social connection to those animals, or worse could be socially excluded. Perhaps a rewording along the lines of "Camelids must be provided with a companion animal. Ideally this animal will be another camelid, but other commonly farmed species may be acceptable if a social bond is created".

Associated documentation for SPCA/MPI inspectors could recommend that they look at the behavior of the animals to determine if they have effectively made some friends. I'm not sure how to phrase that concept in animal-welfare-govenrment speak, but I hope you follow my meaning. A skilled observer of animals should be able to see if an animal is socially isolated or excluded.

And camelids can make friends with bovine and equines, too. I don't know how they would do with deer, but I do know of at least one deer farmer that also raises llamas, so I could enquire if that would be helpful for you.

23. Llama & Alpaca – Offspring (Cria) camelid companions

Proposal: "Prohibit raising Cria without the company of other camelids."

I completely agree, but the outstanding question here is what counts as a cria? Alpaca (and presumably llama, though I don't have supporting data to hand) can be safely weaned as young as 3 months of age (though I would personally not recommend it). But a camelid of that age has by no means learned the social rules of "being a good camelid". In our experience we started by acquiring 3 young alpacas (age ~8 months), and we ran into increasing behavior problems with them until we brought in an adult animal to "sort them out" and "teach them the rules" of being a camelid. Too-early isolation of a camelid would, in my opinion, dramatically increase the possibility of problematic - even dangerous - behaviors as an adult.

How old is old enough? I don't think there is good data to provide a robust answer. My intuition says a cria should have fellow-camelid-companionship for year at minimum, 18-24 months being better/safer. Llamas might require a slightly longer period. I know that their physical development is a bit slower, owing to their larger size, but I do not know if that also applies to their social development.

39. Stock transport – Animals that cannot bear weight evenly due to injury A cattle beast, sheep, deer, pig, or goat that has suffered a physical injury or defect that means it cannot bear weight evenly on all four legs should not be transported, except when certified fit for transport by a veterinarian.

I know this part of the regulations does not mention camelids, but I still wanted to make a comment.

The vast majority of camelid travel in sternal recumbence (aka "kush"), thus it should be possible to transport lame camelids without causing serious welfare issues.

On a related note this makes it much easier to transport a sick/injured camelid, and I know that it is not uncommon to take such an animal to the vet. Smaller alpaca mass less than 60 kg, and thus can start crossing the practical line into "small companion animal" in terms of how and when they are taken to veterinarians. I personally have walked (or carried) more than one sick/injured alpaca into our veterinarians office as that was the best way to get prompt care for the problem.

79. Llama and alpaca – Castration

Proposal: "Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian. Pain relief must be used at the time of the procedure. Alpaca must not be castrated prior to eight months of age. Llama and guanaco must not be castrated prior to 15 months of age."

I agree with these changes, and would be happy to see their implementation.

If a veterinarian thinks there is a medical reason to castrate an animal before this time, I presume they would still be able to make that call?

As always, thank you for your work to improve the standard of animals in NZ.

Kind regards,

Stephen Mulholland, Ph.D.
Chair, The Camelid Health Trust