

**From:** Tiffany Olsen s 9(2)(a)  
**Sent:** Friday, 29 April 2016 5:48 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare Public Consultation

*To whom it may concern*

*This is my submission on the regulations released for consultation in April 2016. I do not believe that sufficient time has been allowed to adequately consider the issues 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 truly

Tiffany Olsen

s 9(2)(a)

**From:** Julie § 9(2)(a)  
**Sent:** Friday, 29 April 2016 8:31 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

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Dear Sir / Madam,

Please note that I feel very strongly that goats should never be tethered. I don't believe the standards in the 'Proposed Animal Welfare Regulations (care & Conduct and Surgical & Painful Procedures)' go far enough and are the proposals are insufficient.

Goats are social herd animals so tethering them alone is both cruel and totally unnecessary. New Zealand is sadly lagging behind many countries in our standards of animal welfare. This is something we really need to improve and if we really believe animals are sentient beings then we need to treat them with more respect.

Yours hopefully,

Julie Inglis.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

**From:** Susan Elias <sup>s9(2)(a)</sup>  
**Sent:** Friday, 29 April 2016 3:23 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare Submission

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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 Sincerely  
Susan Elias

**From:** Tracey Winiata § 9(2)(a)  
**Sent:** Friday, 29 April 2016 4:54 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Please, more time is needed

**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 ne 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. 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 exp. in five weeks.*

*Thank you for your consideration.*

Tracey Winiata





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**From:** Lotte Maxwell Bayly s 9(2)(a)  
**Sent:** Friday, 29 April 2016 1:43 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal welfare submission

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Green Category

I fully support all proposed changes. However I would like to see export of live stock to be banned completely. Export could be limited to embryos and meat/animal bi products only.

Regards

Lotte

s 9(2)(a)

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982



**From:** PrimeVal NZ s 9(2)(a)  
**Sent:** Wednesday, 27 April 2016 7:55 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** 'Submission on Animal Welfare Regulations'

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

to whom it may concern,

As a long standing 30 yrs plus) breeder and owner of purebred dogs I am concerned about the following proposed regulations.

61. Dew claws dogs – The removal of hind dewclaws in puppies under 4 days of age is not therapeutic, it is preventative. A substantial number of large breed dogs (amongst those my own, the Bernese Mountain Dog) are born with hind dew claws. I have found that roughly 50% of the puppies I have bred were born with DOUBLE hind dew claws. These dew claws are set on low (read drag, snatch) and are not articulated. The removal by a vet or other (NZKC) qualified person prior to 4 days of age is painless. However, removing said dew claws from an adult dog after injury is traumatic and painful, with a long road to recovery. The preventative removal is humane and almost certain prevents trauma in later life.

59. Debarking of dogs. In some cases indeed a last resort, must remain as an option to dog owner/breeder. Removing this option will mean otherwise healthy dogs will be PTS (put to sleep). Debarked dogs do not know they are debarked and will continue their lives happily without causing grief to other animals/owners/neighbours as a result of their incessant barking. The only downside of debarking multiple dogs is that when said dogs run together fights could break out without the owner/carer hearing.

62. Tail Docking. I am of the opinion that when done correctly (banded/docked by vet or accredited NZKC person) this procedure does not negatively affect the dog. I have only recently acquired a docked puppy (Dobermann) who in every sense acts/communicates/behaves like my non-docked dogs. In my opinion the breeder should have the freedom of choice to dock or not.

Sincerely,

Nathalie Sperling

Blassis Bernese Mountain Dogs

owner/carer/(past) breeder of

Bernese Mnt Dogs, White Swiss Sheperd, English Pointers, Border Collies and now a Dobermann

NZ importer/distributor of PrimeVal Horse & Dog (joint) food supplements

[www.primeval.co.nz](http://www.primeval.co.nz)

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Out of Scope

**From:** Ruthie § 9(2)(a)  
**Sent:** Thursday, 19 May 2016 2:25 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Re: Submission on Animal Welfare Regulations

**Categories:** Blue Category

Ruth van Dyke

§ 9(2)(a)

Re: Submission on Animal Welfare Regulations

To whom it may concern.

In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and I ask that a more realistic time frame be given for the public to have our say.

I suggest a period of five weeks be given to each section of the proposed welfare regulations. While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, I ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare. I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

Care and conduct regulatory proposals		
1	All animals	Electric prodders



		<p>I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on:</p> <ol style="list-style-type: none"> <li>the species and size of an animal</li> <li>the manner of use of an animal (circus)</li> <li>the location of the animal (slaughter premises)</li> </ol> <p>I support the proposed infringement penalty.</p>
2	All animals	Use of goads
		I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.
3	All animals	Twisting an animal's tail
		I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.
Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <ol style="list-style-type: none"> <li><a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a></li> <li><a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></li> </ol>
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.

8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China
		The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across cook strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed
		I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to <4 degrees Celsius renders crustacean insensible and propose that either: a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to <4 degrees Celsius renders crustacean insensible. I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.
13	Goats	Tethering requirements
		I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ.

		<p>I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500.</p> <p>I also propose that as goats are social animals<sup>1</sup> all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300.</p> <p>1. Miranda-de la Lama, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10</p>
14	Horses	Use of a whip, lead, or any other object
		I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.
15	Horses	Injuries from equipment such as halter, head ropes and saddles
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		<p>I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met<sup>1</sup>.</p> <p>1) Sections 9, 68 Animal Welfare Act 1999</p>
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully<sup>1</sup>. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens<sup>2</sup>. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes<sup>3</sup>) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> <li>• Sufficient length of perching space to allow all birds to perch at the same time; and</li> </ul>



		<ul style="list-style-type: none"> <li>Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night.</li> </ul> <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. <i>'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'.</i></p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage</p> <p>2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. <i>Animal Research</i>, 53: 45-57.</p> <p>3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. <i>Poultry Science</i>, 77: 1828-1832.</p> <p>4) Cooper, J.J. and Ablentosa, M. J. (2003) Behavioural priorities of laying hens. <i>Avian and Poultry Biology Reviews</i>, 14: 127-149.</p>
20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		<p>Proposal: I support the proposal that all pigs have access to a dry sleeping area.</p> <p>Penalty: I support the proposed infringement penalty of \$300.</p>
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believe the formula intended by MPI should read "live weight<sup>0.67</sup> (kg)" but instead it reads "live weight 0.67(kg)" which translates to an Area = 0.03 * liveweight * 0.67(kg) and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p>



		<p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. (2006) which ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI<sup>2</sup>. A k-value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen<sup>3</sup> not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage"<sup>4</sup>. If these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. I would like the regulations to be clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m<sup>2</sup>) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m<sup>2</sup>) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>1) Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spooler, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>2) Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. <a href="http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr">http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr</a></p> <p>3) ibid. Page 9</p> <p>4) "ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 &lt;<a href="https://www.mpi.govt.nz/document-vault/1446">https://www.mpi.govt.nz/document-vault/1446</a>&gt;</p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC<sup>1</sup>. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant</p>



		<p>research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates<sup>2,3</sup>.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>1) "National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 <a href="http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf">http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</a></p> <p>2) Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. <a href="http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042">http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</a></p> <p>3) KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. <a href="http://www.sciencedirect.com/science/article/pii/S0167587711003564">http://www.sciencedirect.com/science/article/pii/S0167587711003564</a></p>
28	Pigs	Provision of nesting material
		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move. I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust.</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p> <p>1) Chaloupková, H. "The effect of nesting material on the nest-building and maternal ... - NCBI." 2011. <a href="http://www.ncbi.nlm.nih.gov/pubmed/20889685">http://www.ncbi.nlm.nih.gov/pubmed/20889685</a></p>
29	Rodeos	Fireworks
		<p>I support the ban of fireworks at rodeo's. The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010) And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 62,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses
		<p>I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.</p>
31	Cattle	Milk stimulation
		<p>I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.</p>

32	Cattle and Sheep	Vehicular traction in calving or lambing
		I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.
33	Cattle and Sheep	Ingrown horns
		I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.
34	Stock transport	Cuts and abrasions
		I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.
35	Stock transport	Animals with ingrown horns
		I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.



41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities
		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		<p>I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading<sup>1</sup>. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a></p>
Proposed	Young Calves	Same day slaughter
		I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a



		slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.
Proposed	Young Calves	Use of nearest slaughterhouse
		Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law. 1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84
44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.
45	Young Calves	Fitness for transport – age
		I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution. 1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.
46	Young Calves	Fitness for transport – Physical characteristics
		I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.
47	Young Calves	Maximum time off feed
		I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper does not demonstrate that: a) this is in fact the case in calves <5 days of age or b) that these calves are not experiencing significant hunger or c) that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study. I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution. 1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.

		2) Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.
48	Young Calves	Duration of transport
		I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves we propose an increase in the infringement penalty to \$1000. 1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84
49	Young Calves	Blunt force trauma
		I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.
50	Young Calves	Transport by sea across Cook Strait prohibited
		I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.
Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work

		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I propose that all cats and dogs sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding
		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure 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 this procedure.
63	Cattle	Teats

		<p>I support the proposal for supernumerary teat removal of animals &gt;6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals &lt;6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that:</p> <p>a) the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age</p> <p>i) infringement penalty of prosecution</p> <p>b) pain relief is required for any supernumerary teat removal procedure regardless of age</p> <p>ii) infringement penalty of prosecution</p> <p>c) procedure is performed using sterilised equipment</p> <p>iii) infringement penalty of \$500</p> <p>d) any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian</p> <p>iv) infringement penalty of prosecution</p>
64	Cattle	Claw removal
		<p>I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.</p>
65	Cattle	Teat occlusion
		<p>I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.</p>
66	Cattle	Tail docking
		<p>I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.</p>
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		<p>I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.</p>
68	Cattle, sheep and goats	Disbudding
		<p>I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support</p>



		the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking
		I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking. Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months. I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male. I support the proposed penalty of prosecution for infringements in sheep > 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use. I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep < 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep < 2 months of age and a penalty of \$300 for lack of NSAID use.
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses

		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty. I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.
79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.
80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.

85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

**From:** Ria van Dyke § 9(2)(a)  
**Sent:** Thursday, 19 May 2016 1:22 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

**Categories:** Blue Category

Ria van Dyke

§ 9(2)(a)

Re: Submission on Animal Welfare Regulations

To whom it may concern,

- ✓ In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare. I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on:</p> <ul style="list-style-type: none"> <li>a. the species and size of an animal</li> <li>b. the manner of use of an animal (circus)</li> <li>c. the location of the animal (slaughter premises)</li> </ul> <p>I support the proposed infringement penalty.</p>
2	All animals	Use of goads
		<p>I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.</p>
3	All animals	Twisting an animal's tail
		<p>I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.</p>



Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China

		<p>The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across Cook Strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.</p>
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed
		<p>I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to &lt;4 degrees Celsius renders crustacean insensible and propose that either:</p> <p>a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR</p> <p>b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to &lt;4 degrees Celsius renders crustacean insensible.</p> <p>I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.</p>
13	Goats	Tethering requirements
		<p>I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ.</p> <p>I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500.</p> <p>I also propose that as goats are social animals all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300.</p> <p>1. Miranda-de la Loma, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10</p>
14	Horses	Use of a whip, lead, or any other object
		I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.
15	Horses	Injuries from equipment such as halter, head ropes and saddles
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.



16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met. <sup>1</sup> 1) Sections 9, 68 Animal Welfare Act 1999
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully<sup>1</sup>. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens<sup>2</sup>. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes<sup>3</sup>) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> <li>• Sufficient length of perching space to allow all birds to perch at the same time; and</li> <li>• Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night.</li> </ul> <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. 'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'<sup>4</sup>.</p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens<sup>4</sup>. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage  2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57.  3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.  4) Cooper, J.J. and Ablentosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>

20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		Proposal: I support the proposal that all pigs have access to a dry sleeping area. Penalty: I support the proposed infringement penalty of \$300.
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believes the formula intended by MPI should read "live weight<sup>0.67</sup> (kg)" but instead it reads "live weight 0.67(kg)" which translates to an Area = 0.03 * liveweight * 0.67(kg) and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. (2006) which ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI. A k-value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen, not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage" . If these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. I would like the regulations to be</p>



		<p>clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m<sup>2</sup>) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m<sup>2</sup>) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>1) Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spooler, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>2) Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. <a href="http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr">http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr</a></p> <p>3) ibid. Page 9</p> <p>4) "ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 &lt;<a href="https://www.mpi.govt.nz/document-vault/1446">https://www.mpi.govt.nz/document-vault/1446</a>&gt;</p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates<sup>23</sup>.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>1) "National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 <a href="http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf">http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</a></p> <p>2) Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. <a href="http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042">http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</a></p> <p>3) KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. <a href="http://www.sciencedirect.com/science/article/pii/S0167587711003564">http://www.sciencedirect.com/science/article/pii/S0167587711003564</a></p>
28	Pigs	Provision of nesting material
		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for</p>



		<p>clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p> <p>1) Chaloupková, H. "The effect of nesting material on the nest-building and maternal ... - NCBI." 2011. <a href="http://www.ncbi.nlm.nih.gov/pubmed/20889685">http://www.ncbi.nlm.nih.gov/pubmed/20889685</a></p>
29	Rodeos	Fireworks
		<p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010) And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 62,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses
		<p>I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.</p>
31	Cattle	Milk stimulation
		<p>I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.</p>
32	Cattle and Sheep	Vehicular traction in calving or lambing
		<p>I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.</p>
33	Cattle and Sheep	Ingrown horns
		<p>I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.</p>
34	Stock transport	Cuts and abrasions
		<p>I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.</p>
35	Stock transport	Animals with ingrown horns

		I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities



		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		<p>I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading<sup>1</sup>. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a></p>
Proposed	Young Calves	Same day slaughter
		<p>I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p>
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves<sup>1</sup>. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		<p>I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.</p>

45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age; therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		<p>I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.</p>
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper does not demonstrate that:</p> <ul style="list-style-type: none"> <li>a) this is in fact the case in calves &lt;5 days of age or</li> <li>b) that these calves are not experiencing significant hunger or</li> <li>c) that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study<sup>2</sup></li> </ul> <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>2) Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves, we propose an increase in the infringement penalty to \$1000.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		<p>I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.</p>
50	Young Calves	Transport by sea across Cook Strait prohibited
		<p>I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.</p>



Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I propose that all cats and dogs sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding



		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure 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 this procedure.
63	Cattle	Teats
		<p>I support the proposal for supernumerary teat removal of animals &gt;6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals &lt;6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that:</p> <ul style="list-style-type: none"> <li>a) the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age <ul style="list-style-type: none"> <li>i) infringement penalty of prosecution</li> </ul> </li> <li>b) pain relief is required for any supernumerary teat removal procedure regardless of age <ul style="list-style-type: none"> <li>ii) infringement penalty of prosecution</li> </ul> </li> <li>c) procedure is performed using sterilised equipment <ul style="list-style-type: none"> <li>iii) infringement penalty of \$500</li> </ul> </li> <li>d) any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian <ul style="list-style-type: none"> <li>iv) infringement penalty of prosecution</li> </ul> </li> </ul>
64	Cattle	Claw removal
		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.

65	Cattle	Teat occlusion
		I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking
		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking
		I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking.

		<p>Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months.</p> <p>I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male.</p> <p>I support the proposed penalty of prosecution for infringements in sheep &gt; 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use.</p> <p>I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep &lt; 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep &lt; 2 months of age and a penalty of \$300 for lack of NSAID use.</p>
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses
		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		<p>I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty.</p> <p>I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.</p>
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.
79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the



		time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.
80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.

**From:** Andrew Solley s 9(2)(a)  
**Sent:** Thursday, 19 May 2016 1:16 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

**Categories:** Blue Category

In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and I ask that a more realistic time frame be given for the public to have our say.

I suggest a period of five weeks be given to each section of the proposed welfare regulations. While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, I ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare. I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on:</p> <ul style="list-style-type: none"> <li>a. the species and size of an animal</li> <li>b. the manner of use of an animal (circus)</li> <li>c. the location of the animal (slaughter premises)</li> </ul> <p>I support the proposed infringement penalty.</p>
2	All animals	Use of goads
		<p>I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.</p>
3	All animals	Twisting an animal's tail
		<p>I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.</p>

Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading, only one individual was prosecuted in relation to the footage, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China



		<p>The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across Cook Strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.</p>
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed
		<p>I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to &lt;4 degrees Celsius renders crustacean insensible and propose that either:</p> <p>a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR</p> <p>b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to &lt;4 degrees Celsius renders crustacean insensible.</p> <p>I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.</p>
13	Goats	Tethering requirements
		<p>I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ.</p> <p>I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500.</p> <p>I also propose that as goats are social animals all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300.</p> <p>1. Miranda-de la Loma, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10</p>
14	Horses	Use of a whip, lead, or any other object
		I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.
15	Horses	Injuries from equipment such as halter, head ropes and saddles
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.

16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		<p>I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met<sup>1</sup>.</p> <p>1) Sections 9, 68 Animal Welfare Act 1999</p>
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully<sup>1</sup>. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens<sup>2</sup>. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes<sup>3</sup>) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> <li>• Sufficient length of perching space to allow all birds to perch at the same time; and</li> <li>• Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night.</li> </ul> <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. 'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'<sup>4</sup>.</p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens<sup>4</sup>. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage</p> <p>2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57.</p> <p>3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.</p> <p>4) Cooper, J.J. and Ablettosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>

20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		Proposal: I support the proposal that all pigs have access to a dry sleeping area. Penalty: I support the proposed infringement penalty of \$300.
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believe the formula intended by MPI should read "live weight<sup>0.67</sup> (kg)" but instead it reads "live weight 0.67(kg)" which translates to an Area = 0.03 * liveweight * 0.67(kg) and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. (2006) which ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI<sup>2</sup>. A k-value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen, not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage" <sup>4</sup>. If these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. I would like the regulations to be</p>



		<p>clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m<sup>2</sup>) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m<sup>2</sup>) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spooler, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. <a href="http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr">http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr</a></p> <p>ibid. Page 9</p> <p>"ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 &lt;<a href="https://www.mpi.govt.nz/document-vault/1446">https://www.mpi.govt.nz/document-vault/1446</a>&gt;</p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates<sup>23</sup>.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>"National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 <a href="http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf">http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</a></p> <p>Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. <a href="http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042">http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</a></p> <p>KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. <a href="http://www.sciencedirect.com/science/article/pii/S0167587711003564">http://www.sciencedirect.com/science/article/pii/S0167587711003564</a></p>
28	Pigs	Provision of nesting material
		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for</p>



		<p>clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust'</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p> <p>Chaloupková, H. "The effect of nesting material on the nest-building and maternal ... - NCBI." 2011. <a href="http://www.ncbi.nlm.nih.gov/pubmed/20889685">http://www.ncbi.nlm.nih.gov/pubmed/20889685</a></p>
29	Rodeos	Fireworks
		<p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010). And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 62,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses
		<p>I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.</p>
31	Cattle	Milk stimulation
		<p>I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.</p>
32	Cattle and Sheep	Vehicular traction in calving or lambing
		<p>I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.</p>
33	Cattle and Sheep	Ingrown horns
		<p>I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.</p>
34	Stock transport	Cuts and abrasions
		<p>I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.</p>
35	Stock transport	Animals with ingrown horns

		I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities



		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		Despite footage from 2015 clearly showing several different people throwing young calves during loading <sup>1</sup> , only one individual was prosecuted in relation to the footage <sup>2</sup> , presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour. <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a> <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading <sup>1</sup> . A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law. <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>
Proposed	Young Calves	Same day slaughter
		I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.
Proposed	Young Calves	Use of nearest slaughterhouse
		Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves <sup>1</sup> . For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law. Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84
44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.

45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper does not demonstrate that:</p> <ul style="list-style-type: none"> <li>this is in fact the case in calves &lt;5 days of age or</li> <li>that these calves are not experiencing significant hunger or</li> <li>that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study?</li> </ul> <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves we propose an increase in the infringement penalty to \$1000.</p> <p>Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.
50	Young Calves	Transport by sea across Cook Strait prohibited
		I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.

Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I propose that all cats and dogs sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding




		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure 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 this procedure.
63	Cattle	Teats
		<p>I support the proposal for supernumerary teat removal of animals &gt;6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals &lt;6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that:</p> <ul style="list-style-type: none"> <li>the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age</li> <li>i) infringement penalty of prosecution</li> <li>pain relief is required for any supernumerary teat removal procedure regardless of age</li> <li>ii) infringement penalty of prosecution</li> <li>procedure is performed using sterilised equipment</li> <li>iii) infringement penalty of \$500</li> <li>any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian</li> <li>iv) infringement penalty of prosecution</li> </ul>
64	Cattle	Claw removal
		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.
65	Cattle	Teat occlusion

		I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking
		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking
		I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking. Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months.

		<p>I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male.</p> <p>I support the proposed penalty of prosecution for infringements in sheep &gt; 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use.</p> <p>I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep &lt; 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep &lt;2 months of age and a penalty of \$300 for lack of NSAID use.</p>
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses
		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		<p>I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty.</p> <p>I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.</p>
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.
79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.



80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.

**From:** Liz Atkinson   
**Sent:** Thursday, 19 May 2016 1:09 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

## MPI Animal Welfare Codes Submission

### Nathan Guy Minister for Primary Industries

In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and I ask that a more realistic time frame be given for the public to have our say.

I suggest a period of five weeks be given to each section of the proposed welfare regulations.

While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, I ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare. I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

- 1) From 5.3m dairy cows in 2007 to 6.4m in 2012 (23% increase in just 5 years) Statistics NZ
- 2) Switzerland banned cages for hens in 1992

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on:</p> <ol style="list-style-type: none"> <li>a. the species and size of an animal</li> <li>b. the manner of use of an animal (circus)</li> <li>c. the location of the animal (slaughter premises)</li> </ol> <p>I support the proposed infringement penalty.</p>
2	All animals	Use of goads
		<p>I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.</p>
3	All animals	Twisting an animal's tail
		<p>I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.</p>



Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China



		The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across Cook Strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed
		I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to <4 degrees Celsius renders crustacean insensible and propose that either: a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to <4 degrees Celsius renders crustacean insensible. I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.
13	Goats	Tethering requirements
		I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ. I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500. I also propose that as goats are social animals: all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300. 1. Miranda-de la Loma, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10
14	Horses	Use of a whip, lead, or any other object
		I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.
15	Horses	Injuries from equipment such as halter, head ropes and saddles
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.

16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met: 1) Sections 9, 68 Animal Welfare Act 1999
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully<sup>1</sup>. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens<sup>2</sup>. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes<sup>3</sup>) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> <li>• Sufficient length of perching space to allow all birds to perch at the same time; and</li> <li>• Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night.</li> </ul> <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. 'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'.</p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens<sup>4</sup>. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage  2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57.  3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.  4) Cooper, J.J. and Abientosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>

20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		Proposal: I support the proposal that all pigs have access to a dry sleeping area. Penalty: I support the proposed infringement penalty of \$300.
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believes the formula intended by MPI should read "live weight<sup>0.67</sup> (kg)" but instead it reads "live weight 0.67(kg)" which translates to an Area = <math>0.03 * \text{liveweight} * 0.67(\text{kg})</math> and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. (2006) which ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI<sup>2</sup>. A k-value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen<sup>3</sup> not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage"<sup>4</sup>. If these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. I would like the regulations to be</p>



		<p>clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m<sup>2</sup>) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m<sup>2</sup>) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>1) Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spooler, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>2) Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. <a href="http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr">http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr</a></p> <p>3) ibid. Page 9</p> <p>4) "ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 &lt;<a href="https://www.mpi.govt.nz/document-vault/1446">https://www.mpi.govt.nz/document-vault/1446</a>&gt;</p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates<sup>23</sup>.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>1) "National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 <a href="http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf">http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</a></p> <p>2) Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. <a href="http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042">http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</a></p> <p>3) KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. <a href="http://www.sciencedirect.com/science/article/pii/S0167587711003564">http://www.sciencedirect.com/science/article/pii/S0167587711003564</a></p>
28	Pigs	Provision of nesting material
		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for</p>



		<p>clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p> <p>1) Chaloupková, H. "The effect of nesting material on the nest-building and maternal ... - NCBI." 2011. <a href="http://www.ncbi.nlm.nih.gov/pubmed/20889685">http://www.ncbi.nlm.nih.gov/pubmed/20889685</a></p>
29	Rodeos	Fireworks
		<p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010). And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 62,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses
		<p>I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.</p>
31	Cattle	Milk stimulation
		<p>I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.</p>
32	Cattle and Sheep	Vehicular traction in calving or lambing
		<p>I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.</p>
33	Cattle and Sheep	Ingrown horns
		<p>I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.</p>
34	Stock transport	Cuts and abrasions
		<p>I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.</p>
35	Stock transport	Animals with ingrown horns

		I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities



		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		<p>I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading<sup>1</sup>. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a></p>
Proposed	Young Calves	Same day slaughter
		I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves<sup>1</sup>. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.

45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age; therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper does not demonstrate that:</p> <ul style="list-style-type: none"> <li>a) this is in fact the case in calves &lt;5 days of age or</li> <li>b) that these calves are not experiencing significant hunger or</li> <li>c) that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study.</li> </ul> <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>2) Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves, we propose an increase in the infringement penalty to \$1000.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.
50	Young Calves	Transport by sea across Cook Strait prohibited
		I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.



Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I propose that all cats and dogs sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding



		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure 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 this procedure.
63	Cattle	Teats
		I support the proposal for supernumerary teat removal of animals >6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals <6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that: a) the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age i) infringement penalty of prosecution b) pain relief is required for any supernumerary teat removal procedure regardless of age ii) infringement penalty of prosecution c) procedure is performed using sterilised equipment iii) infringement penalty of \$500 d) any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian iv) infringement penalty of prosecution
64	Cattle	Claw removal
		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.

65	Cattle	Teat occlusion
		I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking
		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking
		I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking.

		<p>Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months.</p> <p>I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male.</p> <p>I support the proposed penalty of prosecution for infringements in sheep &gt; 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use.</p> <p>I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep &lt; 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep &lt;2 months of age and a penalty of \$300 for lack of NSAID use.</p>
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses
		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		<p>I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty.</p> <p>I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.</p>
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.
79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the



		time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.
80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.

Warm Regards  
Liz Atkinson

s 9(2)(a)

From: Suzanne Beer § 9(2)(a)  
 Sent: Thursday, 19 May 2016 1:01 p.m.  
 To: Animal Welfare Submissions  
 Subject: Animal Welfare Submission

From :-Suzanne Beer

§ 9(2)(a)

## MPI Animal Welfare Codes Submission

**Nathan Guy**

**Minister for Primary Industries**

In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and I ask that a more realistic time frame be given for the public to have our say.

I suggest a period of five weeks be given to each section of the proposed welfare regulations.

While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, I ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare. I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

- 1) From 5.3m dairy cows in 2007 to 6.4m in 2012 (23% increase in just 5 years) Statistics NZ
- 2) Switzerland banned cages for hens in 1992

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on;</p> <ol style="list-style-type: none"> <li>a. the species and size of an animal</li> <li>b. the manner of use of an animal (circus)</li> <li>c. the location of the animal (slaughter premises)</li> </ol> <p>I support the proposed infringement penalty.</p>
2	All animals	Use of goads
		<p>I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.</p>



3	All animals	Twisting an animal's tail
		I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.
Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for



		infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China
		The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across Cook Strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed
		I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to <4 degrees Celsius renders crustacean insensible and propose that either: a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to <4 degrees Celsius renders crustacean insensible. I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.
13	Goats	Tethering requirements
		I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ. I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500. I also propose that as goats are social animals all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300. 1. Miranda-de la Loma, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10
14	Horses	Use of a whip, lead, or any other object
		I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.

15	Horses	Injuries from equipment such as halter, head ropes and saddles
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met: 1) Sections 9, 68 Animal Welfare Act 1999
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully<sup>1</sup>. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens<sup>2</sup>. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes<sup>3</sup>) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> <li>• Sufficient length of perching space to allow all birds to perch at the same time; and</li> <li>• Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night.</li> </ul> <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. 'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'<sup>4</sup>.</p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens<sup>5</sup>. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage</p>

		<p>2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57.</p> <p>3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.</p> <p>4) Cooper, J.J. and Ablentosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>
20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		<p>Proposal: I support the proposal that all pigs have access to a dry sleeping area.</p> <p>Penalty: I support the proposed infringement penalty of \$300.</p>
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believe the formula intended by MPI should read "live weight<sup>0.67</sup> (kg)" but instead it reads "live weight 0.67(kg)" which translates to an Area = 0.03 * liveweight * 0.67(kg) and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. (2006) which ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI<sup>2</sup>. A k-value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen<sup>3</sup> not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage"<sup>4</sup>. If</p>



		<p>these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. I would like the regulations to be clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m<sup>2</sup>) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m<sup>2</sup>) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>1) Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spoolder, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>2) Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. <a href="http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr">http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr</a></p> <p>3) ibid. Page 9</p> <p>4) "ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 &lt;<a href="https://www.mpi.govt.nz/document-vault/1446">https://www.mpi.govt.nz/document-vault/1446</a>&gt;</p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates<sup>2,3</sup>.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>1) "National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 <a href="http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf">http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</a></p> <p>2) Weber, R. "Piglet mortality on farms using farrowing systems ..." - IngentaConnect." 2007. <a href="http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042">http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</a></p> <p>3) KilBride, AL. "A cohort study of preweaning piglet mortality and ..." - ScienceDirect." 2012. <a href="http://www.sciencedirect.com/science/article/pii/S0167587711003564">http://www.sciencedirect.com/science/article/pii/S0167587711003564</a></p>
28	Pigs	Provision of nesting material



		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust.</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p> <p>1) Chaloupková, H. "The effect of nesting material on the nest-building and maternal ... - NCBI." 2011. <a href="http://www.ncbi.nlm.nih.gov/pubmed/20889685">http://www.ncbi.nlm.nih.gov/pubmed/20889685</a></p>
29	Rodeos	Fireworks
		<p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010) And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 62,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses
		<p>I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.</p>
31	Cattle	Milk stimulation
		<p>I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.</p>
32	Cattle and Sheep	Vehicular traction in calving or lambing
		<p>I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.</p>
33	Cattle and Sheep	Ingrown horns
		<p>I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.</p>
34	Stock transport	Cuts and abrasions

		I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.
35	Stock transport	Animals with ingrown horns
		I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.



Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities
		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		<p>I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading<sup>1</sup>. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a></p>
Proposed	Young Calves	Same day slaughter
		I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves<sup>1</sup>. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>

44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.
45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age; therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper does not demonstrate that:</p> <ul style="list-style-type: none"> <li>a) this is in fact the case in calves &lt;5 days of age or</li> <li>b) that these calves are not experiencing significant hunger or</li> <li>c) that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study?</li> </ul> <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>2) Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves we propose an increase in the infringement penalty to \$1000.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.



50	Young Calves	Transport by sea across Cook Strait prohibited
		I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.
Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I propose that all cats and dogs



		sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding
		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure 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 this procedure.
63	Cattle	Teats
		I support the proposal for supernumerary teat removal of animals >6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals <6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that: a) the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age i) infringement penalty of prosecution b) pain relief is required for any supernumerary teat removal procedure regardless of age ii) infringement penalty of prosecution c) procedure is performed using sterilised equipment iii) infringement penalty of \$500 d) any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian iv) infringement penalty of prosecution
64	Cattle	Claw removal

		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.
65	Cattle	Teat occlusion
		I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking
		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking

		<p>I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking.</p> <p>Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months.</p> <p>I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male.</p> <p>I support the proposed penalty of prosecution for infringements in sheep &gt; 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use.</p> <p>I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep &lt; 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep &lt; 2 months of age and a penalty of \$300 for lack of NSAID use.</p>
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses
		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		<p>I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty.</p> <p>I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.</p>
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.



79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.
80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.

**From:** Michelle Androu § 9(2)(a)  
**Sent:** Thursday, 19 May 2016 1:06 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** FW: Submission on Animal Welfare Regulations

11382

**From:** Michelle Androu § 9(2)(a)  
**Sent:** Thursday, 19 May 2016 12:40  
**To:** 'Animal.WelfareSubmissions@mpi.govt.nz'  
**Subject:** Submission on Animal Welfare Regulations

From: Michelle Androu  
§ 9(2)(a)

18<sup>th</sup> May 2016

To The Ministry of Primary Industries,

Re: Proposed Animal Welfare Regulations Paper: 2016/12

11.0 Young Calf (Bobby calf) Management Regulatory Proposals.

11.2.2

- Yes I agree that a strict process whereby each handler of bobby calves signs to declare they have complied with minimum standards of care.

This would remind all parties at all times they are on notice. It would reinforce the importance of animal welfare and would make it far less

likely for cruelty and harsh treatment of calves to occur. It would also make it easier for breaches of animal welfare codes to be reported as the complainant would feel he/she had the law on their side.

- I feel strongly that there is no adequate system for reporting animal cruelty in place whereby the reporter is protected. How many people on farms have witnessed or brought up issues of animal cruelty and been silenced? Who in their right mind would risk losing their job, income, their families welfare, their personal safety, their reputation in a small community, their future job prospects, by reporting animal cruelty to MPI? WHO?
- I brought this up at the MPI public meeting in Auckland 2<sup>nd</sup> may this year and was told the following ; "There is an 0800 phone number for reporting and if the reporter wanted their name confidential they should say so". This is simply not good enough and would discourage anyone from reporting cruelty.
- Protections for complainants need to be thought through carefully and put in to law to protect those who report animal cruelty and breaches of animal welfare codes of practice. Adequate compensation from Government should be allowed in the case of threats and/or job loss for those who make a complaint.
- Farm workers, animal handlers, industry workers are not in a good position to make a report cruelty as he/she will naturally be under suspicion of doing so. They could easily be threatened or lose their job.
- Making sure that those reporting cruelty will be protected by law will send a very strong message to anyone in the farming industry that our Government takes animal welfare and New Zealand's reputation in this regard extremely seriously.
- MPI needs to define animal cruelty clearly and teach those in the industry exactly how to handle bobby calves humanely and with great care and respect. Producing a film showing workers what is

correct/incorrect would better clarify workers legal obligations. This should be produced in consultation with outside parties eg: SPCA and other animal welfare groups as well as farmers.

#### 11.4 The proposals re: Bobby Calves

- 2.2 million bobby calves are sent to slaughter each year in New Zealand according to MPI. This is a holocaust every year in this country.  
Much more ethical methods of dairy farming must be explored and the funds put in place to do so. Ag research is allocated approximately 60 million dollars annually and using some of this public money to ensure ethical farming for the future could be a very smart move for NZ.
- Bobby calves and their mothers have an incredibly strong bond. I suspect one of the main reasons separating the calves from mothers at birth or a few days old is to break this bond and minimize stresses for animals and farmers (short term pain for long term gain). This practice has worked while consumers are made unaware of the animal cruelty inherent in this procedure. Weaning calves too early is apparently very traumatic for both calf and mother and the animals express this very loudly and persistently by crying.
- Our Government should encourage a new model of farming whereby bobby calves stay with mothers until weaned naturally (3-5 months).  
This kind of farming is now practiced in some countries on a small industrial scale and consumers are happy to pay more for the more expensive milk. NZ could eventually promote this product to a more discerning market overseas and within NZ (ethical milk producers), much like organic food, which fetches very high prices.

#### 43. Loading and unloading.

- Transportation, loading and unloading of bobby calves should be given top priority in the animal welfare codes going forward. At present it is completely ridiculous to expect a traumatized, dehydrated, starved, weak baby calf to get up on its feet and walk up a ramp to a truck. It just will not happen. These baby animals are fresh from the womb and cannot follow instructions or prods. They are babies.
- Ban the transportation of bobby calves less than 2 weeks old. This will cut the incidence of cruelty, prevent ongoing welfare issues, reporting, concerns and may save the government money by decreasing infringements (hopefully).
- Animal handlers should be properly trained and paid accordingly. More workers for each load may be needed to ensure safe handling.
- Timelines set by farmers/transporters/slaughterhouses should be overseen and modified by MPI to ensure bobby calves are not mistreated and traumatized by being manhandled, thrown, kicked due to time constraints.
- All handling should be done under strict codes of practice and spot check instigated by MPI without notification.

#### 45. Fitness for transport-age.

- With the above in mind I strongly disagree that calves should be removed from their mothers before 2-3 weeks old at least.
- Transportation from the farm should be prohibited before 2 weeks old. It is illegal to transport baby calves under 2 weeks old in the European Union if the journey is over 8 hours. This shows us that many countries have serious concerns over treatment of very young animals.
- All handling should be done under strict codes of practice and spot check instigated by MPI without notification.



- Transportation of bobby calves should be given top priority in the animal welfare codes going forward. Animal handlers should be properly trained and paid accordingly. More workers for each load may be needed to ensure safe handling. Timelines set by farmers/transporters/slaughterhouses should be overseen and modified by MPI to ensure bobby calves are not mistreated and traumatized by being manhandled, thrown, kicked due to time constraints.
- Financial incentives should be found to help farmers keep bobby calves to an older age before transport/slaughter (a subsidy of some kind).

#### **48. Young calves-duration of transport.**

- Records need to be kept of all infringements of animal welfare codes regarding transport. Trucks should have a large and clear identification for reporting issues.
- Transportation of bobby calves should be no longer than 6 hours. Calves should be fed well 1-2 hours before being put on trucks.
- Water should be available to calves at all times during transport and on arrival.

#### **49. Young calves-Blunt force trauma**

- Ban the killing of bobby calves by blunt force trauma. This is barbaric and extremely cruel and mostly doesn't result in a painless death as we have seen on the film footage by Farmwatch.
- NZ Government should fund registered vet visits to farms for any necessary humane euthanasia of sick or badly injured bobby calves.  
This would encourage farmers to deal quickly and efficiently with poorly animals without great expense and help to avoid cruelty by bashing the calf with an instrument to kill it.

Thank you for the opportunity to make a submission.

Yours sincerely

Michelle Androu

Out of Scope

**From:** Annie Whiteside s 9(2)(2)  
**Sent:** Tuesday, 17 May 2016 3:56 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Feedback on new young calf management proposals

To the Minister / Ministry for Primary Industries

I fully support the SPCA in their belief of;

- not transporting bobby calves before they are 10 days old
- not confining bobby calves for more than two hours while awaiting transport
- providing proper bedding for bobby calves while awaiting transport
- providing proper bedding for bobby calves during transport
- ensuring better and more humane methods for loading and unloading bobby calves. Throwing animals is totally unacceptable
- limit the time and distance bobby calves are transported and drivers must drive with respect and care for these and other animals
- if a bobby calf is to be murdered, do it quickly on the day of transport

In addition I strongly urge for the appointment of a Minister for Animal Welfare.

Best regards  
Annette Whiteside

Sent from my iPhone



# National Animal Welfare Advisory Committee

s 9(2)(a) Manager  
Regulatory Reform & Animal Welfare  
Policy & Trade  
Ministry for Primary Industries  
PO Box 2526  
Wellington 6140

By email to: [aws submission@mpi.govt.nz](mailto:aws submission@mpi.govt.nz)

## Proposed Animal Welfare Regulations (Care & Conduct, Surgical & Painful Procedures, and Live Export)

Submission by the National Animal Welfare Advisory Committee  
(NAWAC)  
19 May 2016

### 1. Introduction

- 1.1 NAWAC is established under the Animal Welfare Act to provide independent advice on animal welfare to the Minister for Primary Industries. NAWAC gives the Minister for Primary Industries advice on:
- the welfare of animals in New Zealand
  - animal welfare research needs
  - codes of welfare
  - traps and devices
  - hunting and killing animals in a wild state
  - legislative proposals
  - regulations.
- 1.2 NAWAC has participated in the drafting process of many of the regulations in the discussion document by having selected members on the regulations working group (along with advisors from MPI, members of the RNZSPCA, and members of the New Zealand Veterinary Council).
- 1.3 NAWAC is able to propose regulations to the Minister for Primary Industries itself, and has identified several areas to be addressed in the future as part of its longer term strategy to provide advice on animal welfare in New Zealand.



## 2. NAWAC's position on the discussion document

- 2.1 NAWAC is broadly supportive of the proposals. NAWAC agrees that introducing directly enforceable regulations will improve the enforceability of those standards previously found in codes of welfare.
- 2.2 Notwithstanding our general support we submit the following points in regards to all proposals:
- 2.2.1 The infringement fees proposed are low. NAWAC notes that the Act can support up to a \$1,000 fine, so questions why they have been capped at \$500 and the process for setting the fee level. The comparison with infringements under the Biosecurity, Food Safety and Dog Control Acts are not very convincing, as how can you equate the harms caused under these three Acts with animal welfare harm?
  - 2.2.2 Further, it is not clear where the dividing line is set between the \$300 and \$500 fee level for infringement offences. NAWAC does not agree with some of the penalty proposals put forward, and has listed those cases below under 'specific feedback'. However, the reasoning for setting penalties in terms of the potential animal welfare impact should have been clearer, as it is difficult to follow why the penalty decisions were made for each proposal.
  - 2.2.3 NAWAC supports that the changes to the Act not yet in force should be brought into effect at the same time as the regulations rather than in 2020.
  - 2.2.4 NAWAC has some concern over recidivist offenders and what kind of escalation strategies will be in place for those offenders who repeatedly do not pay their fines or change their behaviour.
  - 2.2.5 In regards to question 13, NAWAC supports that the defences should be expanded to include "...necessary for the preservation, protection, or maintenance of human or animal life". Some provision should be in place to acknowledge that emergency situations can occur where a person may choose to breach one of these regulations in order to save the life of an animal or spare it from further pain or distress.
  - 2.2.6 NAWAC has some concerns around those regulations which 'may be performed by anyone' in the painful and surgical procedures section. Rather than allowing 'anyone' other than a veterinarian, we would prefer to move towards a system that defines the competency level required for these surgical and painful procedures.
  - 2.2.7 NAWAC has been working with hunting and fishing groups on clarifying the definition of generally accepted practice, a term introduced in the Animal Welfare Amendment Act (2). Some regulations may influence the meaning of generally accepted practice and could conflict with this work, for example, creating confusion over whether or not it is 'generally

accepted' to drown animals other than cats and dogs. NAWAC submits that regulations should be considered with this in mind.

2.2.8 NAWAC has worked with MPI to identify so-called "tranche II" issues, or those matters which were not necessarily lifted from codes of welfare but represent potentially major animal welfare issues that could be addressed via regulations in the future. We believe timely consideration of these issues is necessary as some have far greater welfare impacts than the more straightforward issues being dealt with in the first tranche. There needs to be clarification whether the lead for progressing these lies with MPI or NAWAC.

2.2.9 NAWAC must be consulted on regulations proposed by MPI. We request access to the final version of the regulations once they are drafted in order to provide sound advice to the Minister on their potential welfare impact.

### **3. Specific feedback**

3.1 NAWAC supports the intent and rationale around most of the proposals and the points below are only to highlight those areas where we have identified issues about specific proposals. The lack of other comment indicates full support from NAWAC for the proposals as they stand.

3.2 There should be more specificity around the meaning of 'other animals' in proposal 1 (in regards to electric prodders). There may be some groups of animals where the use of an electric prod is never appropriate, such as young animals, and this should be specified.

3.3 NAWAC is also concerned over the practicality of proposal 1 where farmers are handling other large animals that are dangerous outside of a commercial slaughter premises (such as large rams or sows).

3.4 Finally, the wording, "where the safety of the handler is at risk" is too vague and prone to be misused. NAWAC is concerned about a potential conflict with human safety rules. NAWAC suggests the word 'threatened' rather than 'at risk' implying an actual rather than possible risk.

3.5 Proposal 3 prohibits twisting the tail of an animal in a manner that causes the animal pain. NAWAC submits that it is difficult or impossible to objectively measure 'in a manner that causes the animal pain'. We agree that it is worthwhile to convey that this is not an acceptable thing to do, however NAWAC is concerned the use of vague wording here could make enforcement difficult.

3.6 Tethers must not restrict access to water (in cases of long-term restraint i.e. more than 4 hours, not temporary). Proposal 5 should specify that the animals

must be able to access water when tethered long-term, and the regulation should apply to any species that gets tethered.

- 3.7 Further, the penalty for proposal 5 should be set at the higher level, as breaching this standard would cause a high level of pain and distress.
- 3.8 Tight muzzling as described in proposal 6 may be appropriate for short periods of time (e.g. in veterinary offices and for no more than 30 minutes), but NAWAC agrees that the standard is appropriate for longer periods of muzzling.
- 3.9 Proposal 7 should also include access to water.
- 3.10 It must be ensured that if a person causes their dog to suffer extreme distress or die from being left in a vehicle that they can still be prosecuted to the full extent of the Act, not just to the infringement level in proposal 9. A high-end infringement rather than a prosecutable offence may be more appropriate here, as presumably an infringement-level offence would be due to a lower level of suffering endured while higher levels would result in a full prosecution.
- 3.11 NAWAC submits that proposal 10 to prohibit the drowning of cats and dogs should be extended to "any animal", with clarifications around marine animals as necessary.
- 3.12 NAWAC found the wording of proposal 12 unwieldy, especially the intention of 'not imminently destroyed'. Imminent destruction seems to be able to include any method of killing, including boiling (though it may not be 'generally accepted practice'). The regulation requires greater clarity around the differences between commercial and recreational fishers. Presumably this was written to stop recreational fishermen from boiling lobsters and crayfish, as per the commercial slaughter code. We suggest a clear prohibition on killing these animals by boiling.
- 3.13 NAWAC supports proposals 13, 22 and 23 but notes that companionship is an issue for many animals apart from camelids, and that the social needs of tethered goats and other animals should be considered as well. NAWAC is in agreement for these regulations to proceed as they are at the moment, but the issue of companionship for many animals – an identified "tranche II" issue - will need to be considered in a timely manner.
- 3.14 NAWAC supports proposal 24 for a dry sleeping area for pigs but is unclear on how farrowing crates will meet the requirement in all cases.
- 3.15 NAWAC submits strong support in favour of proposal 28: provision of nesting material for pigs, an identified area of non-compliance and a current provision of the 2010 pig code of welfare.



- 3.16 Proposal 29 in regards to fireworks and pyrotechnics could be extended to animals used in any entertainment event.
- 3.17 Proposal 30 in regards to exotic animals is unclear. What restrictions are to be placed? The proposal as it stands does not go further than standards in the current code of welfare. NAWAC submits that there should a prohibition on certain groups of exotic animals at least, for example elephants, primates, and large cats. For others, use could be considered subject to satisfactory management plans.
- 3.18 We have some hesitation over the definition of 'touching' in proposal 33, in particular the varying degrees of suffering between a horn touching compared to penetrating tissue and how this will be dealt with in terms of penalties.
- 3.19 NAWAC submits that backrub from transport causes severe pain and distress, and so the penalty listed in proposal 34 in regards to injuries in transport is not enough. The most severe cases should in fact be prosecuted under the Act. The difference between an infringement (cuts, abrasions) and severe tissue loss must be defined clearly.
- 3.20 We consider that enforcement will be an issue for proposal 38. We agree with the intent of the regulation but submit that the proposed lameness scoring system is too subjective to support a regulation, though another scoring system could be more effective.
- 3.21 NAWAC agrees with proposal 41 in regards to transporting animals with painful udders but disagrees with the penalty level due to the amount of pain and distress caused. We submit that this should be a prosecutable offence.
- 3.22 NAWAC supports an infringement offence over a prosecutable offence for proposals 44 and 45.
- 3.23 NAWAC supports proposal 48 in regards to transport time for young calves, but considers that the penalty should be higher and able to address companies if necessary.
- 3.24 In terms of blunt force trauma in proposal 49, NAWAC has submitted before that this is not a welfare issue but an ethical one. If a blunt object is used on a calf and the animal is rendered immediately insensible and killed, we question the need for a penalty for that action. However, failing to render animals insensible before death should be an offence. There is an obligation to ensure that animals that are thought to be killed are actually dead and that obligation could be regulated.

- 3.25 NAWAC questions what value proposal 50 will add on top of the proposal that limits transport time to 8 hours. An upper limit of 8 hours may rule out ferry crossings (5 hours) already.
- 3.26 NAWAC submits that under proposal 56, the situation where declawing is in the 'best interest' of the cat (i.e. it will be euthanised otherwise) is highly unlikely to occur as rehoming is a viable option before euthanasia.
- 3.27 The definition of 'pain relief' is sometimes unclear, for example we questioned whether topical pain relief would be acceptable for disbudding calves at an early age.
- 3.28 NAWAC has concerns over the consistency of requiring pain relief; for example, that it is required for disbudding calves but not tail docking lambs. We recognise that it reflects industry practice but a lack of pain relief at docking is not good welfare.
- 3.29 NAWAC supports proposal 62 to ban tail docking in dogs as it stands. Based on our understanding of the science we regard this procedure, which can cause acute or chronic pain, as unnecessary for the welfare of the animal and thus it does not meet the requirements of Section 4(d) of the AWAA 2015.
- 3.30 Further, NAWAC disagrees that the age for sheep tail docking in proposal 70 should be six months. We recognise however that this has been lifted from the code of welfare for painful husbandry procedures and so may be the appropriate level at this point in time.
- 3.31 The code of welfare for pigs states in a recommended best practice that "only one-third to one-half of the tail should be removed". We submit that this should be added to proposal 81.
- 3.32 NAWAC questions the rationale for the penalty level of proposal 85, but otherwise supports the proposal.
- 3.33 In regards to live export, NAWAC is encouraged that the provisions of the Act can be actively enforced via regulations. We have no specific comments at this time.

The primary contact for this submission is John Hellström at <sup>s 9(2)(a)</sup> [redacted] or <sup>s 9(2)(a)</sup> [redacted]

NAWAC can also be contacted via the secretariat at [NAWAC@mpi.govt.nz](mailto:NAWAC@mpi.govt.nz) or <sup>s 9(2)(a)</sup> [redacted]

**From:** R PICCIOTTO § 9(2)(a)  
**Sent:** Monday, 16 May 2016 11:43 p.m.  
**To:** Animal Welfare Submissions  
**Cc:** Hans Kriek; Patricia Callis  
**Subject:** Submission on Animal Welfare Regulations

**Categories:** Green Category, Blue Category

It is time for New Zealand to ban rodeos and other obscene displays of animal cruelty. The new rules should also:

- deal with all levels of animal neglect and cruelty:
  - Dogs travelling on the back of vehicles on public roads must be secured so they don't fall off
  - Pain relief should be administered when de-horning cattle, sheep or goats,
  - Individuals leaving dogs in hot vehicles should be penalized
  - De-clawing cats and de-barking dogs should be prohibited except for therapeutic purposes.
  - Transport of injured stock should be validated by a veterinarian
  - certificate
  - Hot branding any animal should be prohibited.
- address issues related to dairy and beef calves.
  - The time between last feed and slaughter for young calves would be reduced from 30 hours to 24 hours.
  - Adequate shelter for young calves should be required
  - Maximum truck journey times for young calves would be reduced
  - Transportation across the Cook Strait would be banned
  - There should be a requirement for young calves to be fit enough for transport.
  - Handlers of young calves will be required to handle them properly.
- The regulations relating to live animal exports should strengthen New Zealand's reputation as a responsible exporter of animals and animal products by giving the Director-General more powers to require reports on the welfare of animals during and after export, and take those reports in to account when considering future export approvals.
- The existing ban on the export of livestock for slaughter should become permanent.



**From:** Kath Worsfold s 9(2)(a) on behalf of Bill and Kath Worsfold  
s 9(2)(a)

**Sent:** Thursday, 19 May 2016 12:19 p.m.

**To:** Animal Welfare Submissions

**Subject:** Submission on Animal Welfare Regulations

**Categories:** Blue Category

## MPI Animal Welfare Codes Submission

### Nathan Guy Minister for Primary Industries

In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and I ask that a more realistic time frame be given for the public to have our say.

I suggest a period of five weeks be given to each section of the proposed welfare regulations.

While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, I ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare. I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

- 1) 1. From 5.3m dairy cows in 2007 to 6.4m in 2012 (23% increase in just 5 years) Statistics NZ
- 2) 2. Switzerland banned cages for hens in 1992

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on:</p> <ol style="list-style-type: none"> <li>a. the species and size of an animal</li> <li>b. the manner of use of an animal (circus)</li> <li>c. the location of the animal (slaughter premises)</li> </ol> <p>I support the proposed infringement penalty.</p>
2	All animals	Use of goads



		I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.
3	All animals	Twisting an animal's tail
		I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.
Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading, only one individual was prosecuted in relation to the footage, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles

		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China
		The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across cook strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed
		I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to <4 degrees Celsius renders crustacean insensible and propose that either: a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to <4 degrees Celsius renders crustacean insensible. I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.
13	Goats	Tethering requirements
		I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ. I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500. I also propose that as goats are social animals: all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300. 1. Miranda-de la Lama, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10
14	Horses	Use of a whip, lead, or any other object



		I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.
15	Horses	Injuries from equipment such as halter, head ropes and saddles
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met. 1) Sections 9, 68 Animal Welfare Act 1999
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully<sup>1</sup>. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens<sup>2</sup>. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes<sup>3</sup>) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> <li>• Sufficient length of perching space to allow all birds to perch at the same time; and</li> <li>• Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night.</li> </ul> <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. 'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'<sup>4</sup>.</p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens<sup>5</sup>. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p>

		<p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage</p> <p>2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57.</p> <p>3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.</p> <p>4) Cooper, J.J. and Ablentosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>
20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		<p>Proposal: I support the proposal that all pigs have access to a dry sleeping area.</p> <p>Penalty: I support the proposed infringement penalty of \$300.</p>
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believe the formula intended by MPI should read "live weight<sup>0.67</sup> (kg)" but instead it reads "live weight 0.67(kg)" which translates to an Area = 0.03 * liveweight * 0.67(kg) and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. (2006) which ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI<sup>2</sup>. A k-value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen, not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate</p>



		<p>areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage" 4. If these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. I would like the regulations to be clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m2) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m2) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spolder, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. <a href="http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr">http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr</a></p> <p>ibid. Page 9</p> <p>"ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 &lt;<a href="https://www.mpi.govt.nz/document-vault/1446">https://www.mpi.govt.nz/document-vault/1446</a>&gt;</p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates<sup>23</sup>.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>"National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 <a href="http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf">http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</a></p> <p>Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. <a href="http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042">http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</a></p> <p>KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. <a href="http://www.sciencedirect.com/science/article/pii/S0167587711003564">http://www.sciencedirect.com/science/article/pii/S0167587711003564</a></p>
28	Pigs	Provision of nesting material



		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move. I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust.</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p> <p>Chaloupková, H. "The effect of nesting material on the nest-building and maternal ... - NCBI." 2011. <a href="http://www.ncbi.nlm.nih.gov/pubmed/20889685">http://www.ncbi.nlm.nih.gov/pubmed/20889685</a></p>
29	Rodeos	Fireworks
		<p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010) And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 62,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses
		<p>I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.</p>
31	Cattle	Milk stimulation
		<p>I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.</p>
32	Cattle and Sheep	Vehicular traction in calving or lambing
		<p>I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.</p>
33	Cattle and Sheep	Ingrown horns
		<p>I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.</p>
34	Stock transport	Cuts and abrasions

		I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.
35	Stock transport	Animals with ingrown horns
		I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.



Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities
		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p><a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		<p>I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading<sup>1</sup>. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p><a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a></p>
Proposed	Young Calves	Same day slaughter
		<p>I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p>
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves<sup>1</sup>. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>



44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.
45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age; therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper does not demonstrate that:</p> <ul style="list-style-type: none"> <li>this is in fact the case in calves &lt;5 days of age or</li> <li>that these calves are not experiencing significant hunger or</li> <li>that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study<sup>2</sup></li> </ul> <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves we propose an increase in the infringement penalty to \$1000.</p> <p>Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.

50	Young Calves	Transport by sea across Cook Strait prohibited
		I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.
Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I purpose that all cats and dogs

		sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding
		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure 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 this procedure.
63	Cattle	Teats
		<p>I support the proposal for supernumerary teat removal of animals &gt;6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals &lt;6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that:</p> <ul style="list-style-type: none"> <li>the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age</li> <li>i) infringement penalty of prosecution</li> <li>pain relief is required for any supernumerary teat removal procedure regardless of age</li> <li>ii) infringement penalty of prosecution</li> <li>procedure is performed using sterilised equipment</li> <li>iii) infringement penalty of \$500</li> <li>any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian</li> <li>iv) infringement penalty of prosecution</li> </ul>
64	Cattle	Claw removal
		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I



		propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.
65	Cattle	Teat occlusion
		I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking
		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking

		<p>I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking.</p> <p>Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months.</p> <p>I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male.</p> <p>I support the proposed penalty of prosecution for infringements in sheep &gt; 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use.</p> <p>I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep &lt; 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep &lt;2 months of age and a penalty of \$300 for lack of NSAID use.</p>
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses
		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		<p>I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty.</p> <p>I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.</p>
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.

79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.
80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.



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**From:** Sharon Arnerich s.9(2)(a)  
**Sent:** Monday, 16 May 2016 11:09 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare Submission

**Categories:** Blue Category

I would like to take the opportunity to express my opinions on this subject due to my extreme concern for practices and legislation in this country.

The extent of cruelty in this country is appalling and more needs to be done to address these issues.

### Farming Practices

- Bobby Calves - this needs to be addressed immediately- media coverage of this has exposed horrendous and sickening practices that the public were unaware of need to stop
- Sow Crates usage is inane, cruel and unnecessary! How inhumane & unnatural can this be- it's just sick to subject a living breathing intelligent animal to this? I no longer eat pork unless it's free range after watching live footage of how this system operates
- Poultry- Caged hens. It seems the new upgraded cage systems are even more horrendous than what preceded them- BAN caged hens- no animal deserves this treatment- we are regressing in this area not improving
- Slaughter Procedures- it is said that if slaughter houses had glass walls we would all be vegetarians. These processes need to be revised and updated and made acceptable- in this day & age where film footage of these hideous processes appears regularly on social media there needs to be immediate movement to change these practices to humane ones
- Live Stock Exports- these are horrendous and should NOT be allowed. The unnecessary suffering and death of these animals has been well documented and needs to be stopped immediately- why would we continue to allow this?

### Experimental Purpose

The number of animals that are used in testing in NZ is appalling- it's about as tragic as the Japanese with their whaling for experimental purposes! And it is happening here - if it needs to occur for veterinary training purposes then it needs to be done humanely- it seems that almost 50% of them don't live and the numbers used is unacceptable

### Recreational

- Racing Industry-Horses & Dogs - again media footage of the abhorrent practices in these industries show need to be completely overhauled.- what part of what they do is okay? The use of live bait- the killing of 9/10 greyhounds bred, immediate destroying of race horses etc- the list is endless, again major reform is required urgently
- Rodeos- Branding & Dehorning without anaesthetic etc- this needs to end-what part of harming animals is acceptable Quote Ricky Gervais "Anyone who hurts or terrifies an animal is a #&\*#! And they call this sport?
- Duck Shooting- Lead Shot usage- why does this even occur? Bad enough that birds are killed and maimed in nothing short of slaughter but the ones that do escape are destined to die a slow and cruel death with lead poisoning- what living creature deserves this in the name of 'sport'?

### General Public Animal Cruelty

### Accountability& Appropriateness of Abuse Punishment

We are continually appalled by the pathetic sentences to people who abuse animals- starving and beating them or neglecting them- the latest being a woman who starved and neglected her animal to the point it was in chronic pain barely able to stand and for that she gets a brief period of Community Service and a negligible fine and is not able to own an animal for 10 years. This is not acceptable- people like this should never have animals to care for as they are obviously not capable of doing so- they are not going to change! Lack of just punishment does nothing to deter these people and until some realistic punishments are meted out this will continue to happen

### Misappropriation of Resources

I live on the north shore and there seems to be a severe issue of resources in the wrong areas - we have animal control staff on the beaches approaching people with dogs not on the lead at 10am in the morning during Daylight Saving when there are serious animal abuse & neglect issues in other areas of Auckland which should be being dealt with but there is no-one in sight in these areas. There needs to be some parity between real need and resources available

Please help this country address the issues we have!

Many thanks  
Sharon McMahon

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15 May 2016

farm**watch**

Animal Welfare Policy  
Ministry for Primary Industries  
animal.welfaresubmissions@mpi.govt.nz

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## Submission on Proposed Animal Welfare Regulations

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**Disclaimer:** Farmwatch's submission on the Proposed Animal Welfare Regulations should in no way be thought of as support for animal use industries. As a vegan animal rights organisation, we do not condone the use of animals by humans, including but not limited to farming, entertainment, companion animal breeding and animal testing.

**Notes:** Following our meeting with MPI and other animal welfare organisations in Wellington on May 9<sup>th</sup>, it is clear that the SPCA and SAFE will be providing scientific evidence to support their submission's. Given the general agreement between the three organisations, we consider that the science component will be well covered and we have sort to make a submission based on our experience we an investigation group.

As discussed at that meeting, we would like to second SAFE's calls for MPI to take a stronger stance on factory farming by the creation of a vision to move away from all factory farming, in all industries, over the coming decade.

Finally, with all of these regulations we have concerns about enforcement by MPI. It is our contention that for these regulations to have a meaningful and positive impact on animal welfare in New Zealand then they need to be both enforceable and enforced. We would like to see MPI take a more proactive approach to ensuring compliance with these regulations and the Animal Welfare Act.

#### CARE AND CONDUCT REGULATION PROPOSALS

1. **All animals – Electric prodders**
  - a. we support the SPCA's submission that a weight of 100kgs is too light
  - b. we would like to see a full ban on circuses, rendering this proposal unnecessary
  - c. as per 1(a)
    - i. we would like clarification on what "where the safety of the handler is a risk" means in enforcement terms.
2. **All animals – Use of goads:** we support this proposal. It is our view that the use of goads on all sensitive areas is unjustified.
3. **All animals – Twisting an animal's tail:** we support this proposal. In addition to the dairy industry, we have first hand experience of widespread use of tail twisting within the rodeo industry to encourage resistant animals to move and to buck harder in the arena. We would like to see it clearly set out that no tail twisting is ever acceptable. We view any fine distinctions in tail twisting difficult with respect to enforceability.

4. **Dogs – Pinch and prong collars:** we support this regulation to prohibit the use of pinch and prong collars.
5. **Dogs – Injuries from collars or tethers:** we support this proposal.  
**NOTE:** We would also like to see stronger requirements for daily exercise of dogs and enrichment. Having visited many chained dogs, we have grave concerns about the quality of life many of these dogs experience, even when provided with the minimum level of exercise.
6. **Dogs – Muzzling a dog:** we support this proposal and suggest that dogs should be able to drink while wearing a muzzle.
7. **Dogs – Dry and shaded shelter:** we support this proposal.
8. **Dogs – Dogs left in vehicles:** in principle we support this proposal. We do wonder about the enforceability of “excessive panting” and “excessive drooling”. How will this be measured and enforced?
9. **Dogs – Secured on moving vehicles:** we support this proposal.
10. **Dogs & Cats – Drowning dogs and cats:** we think that this should be extended to include all mammals, not just dogs and cats.
11. **Eels – Insensible for desliming:** we support this proposal.
12. **Crabs, rock lobsters, and crayfish – Insensible before being killed:** we support this proposal.

**NOTE:** We have concerns about the wellbeing of crustaceans kept in restaurants for eating purposes. While not covered by these regulations we would like this to be considered.

13. **Goats – Tethering requirements:** we do not think that goats should be allowed to be tethered on roadsides; they are very vulnerable in these exposed locations. We support the proposal that goats must be given constant access to food, water, and shelter. Goats are browsers, not grazers, and as such think that the wording needs to be amended to say appropriate food to highlight this. We believe that goats must also be required to have a companion because they are herd animals. The requirements for shelter should be spelt out more clearly so that the regulation is enforceable.
14. **Horses – Use of a whip, lead or any other object:** we support this proposal.
15. **Horses – Injuries from equipment such as halter, head ropes and saddles:** we support this proposal.
16. **Horses & donkeys – Tethering requirements:** we support this proposal.
17. **Layer hens – Opportunity to express normal behaviours in housing systems:** we want to see a ban all caged layer hen systems. We believe that now is a crucial time to make such a decision, before any more farmers invest money in new colony cage systems. You note that colony cages are considered to meet proposed regulation 17(a), but we find this hard to believe. Our recent investigation to a new colony facility in Waikato clearly documented the poor conditions of these new colony systems. Of particular

concern were the amount of hens who were dead or dying, trapped under the bottom perches and at the front of the cages. These perches sit about 10 centimetres from the bottom of the cage floor and hens who became trapped there could not access food or water and were slowly starving. See figure 1.



Figure 1: dead hen on the left trapped under perch. Image taken by Farmwatch, February 2016.

While these cages provide hens with slightly more space than conventional battery cages, they still offer little room for a hen to move about and stretch her wings. We cannot see how these cages could possibly be meeting the requirement to display natural patterns of behaviour.

18. **Layer hens – Stocking density:** we believe that all hens should be free range only and adequate access to outside should be provided.
19. **Layer hens - Housing and equipment design:** our main comment about this is that as per 17, hens need to be prevented from getting stuck under perches and other equipment in colony cages. We strongly advise a move away from caged systems completely.
20. **Layer hens – Induced moulting:** we support this proposal.
21. **Llama & alpaca – Injuries from equipment such as halters, head ropes and packs:** we support this proposal.
22. **Llama & alpaca – Companion animals:** we support this proposal and would like to see it extended to require goats to also have companions.



23. **Llama & alpaca – Offspring (Cira) camelid companions:** we support this proposal.
24. **Pigs – Dry sleeping area:** we support this proposal. It is our experience that pigs sleeping areas are often wet due to leaks in buildings, problems with watering systems, over crowding and excrement.
25. **Pigs – Lying space for grower pigs:** we believe that grower pigs should be given litter and more space. Should this not be the case, we believe that grower pigs should be given more space. It is our experience that many grower pigs live in overcrowded pens and this is a contributor to tail biting and cannibalism.
26. **Pigs – Dry sow stalls:** we support this proposal.
27. **Pigs – Size of farrowing crates:** we strongly believe that farrowing crates should be banned outright. Should they remain, we believe that either the crates need to be larger, or the breed of pigs used should be smaller. We have seen a trend towards larger breeds of pigs over the last decade and it is not uncommon to encounter pigs that touch the sides of their crates and who cannot lie down comfortably at all.

**NOTE:** given the recent fires within farrowing facilities in New Zealand we believe that all farrowing systems must have sprinkler systems installed. Where a building exists, we request that these be retrofitted. Being burnt alive is not acceptable and it is well known that farrowing systems have an increased fire risk due to the additional heat lamps for piglets.

28. **Pigs – Provision of nesting material:** we would like to see all sows provided with nesting material.
29. **Rodeo – Fireworks:** we support this ban. We would like to see it extended to all events where animals might be present, such as A&P shows.

**NOTE:** we would like to see a complete ban on all rodeo events. Along with SAFE and the SPCA, we currently have a submission with the Primary Industry Select Committee relating to a request for a ban on all rodeo events. We jointly submitted a petition with over 63,000 signatures, supporting a ban.

30. **Exotic animals – Used in circuses:** We want to see a complete ban on exotic animals in circuses. Over the years we have campaigned to see an end to the last NZ circus with exotic animals. We think it is a good sign that there are currently no exotic animal circuses and now is a good time to make that permanent.
31. **Cattle – Milk stimulation:** we support this proposal.

32. **Cattle and sheep – Vehicular traction in calving and lambing:** we support this proposal.
33. **Cattle and sheep – Ingrown horns:** we support this proposal.
34. **Stock transport – Cuts and abrasions:** we support this proposal.
35. **Stock transport – Animals with ingrown horns:** we support this proposal.
36. **Stock transport – Animals with bleeding horns or antlers:** we support this proposal.
37. **Stock transport – Animals with long horns or antlers:** we support this proposal.
38. **Stock transport – Lamé cattle, deer, pigs and goats:** we support this proposal. We question how this would be enforced, given that it is currently not clear who is ultimately responsible for making the decision about transport, the owner or the transporter. We would like to see some kind of documentation process that states who is responsible for what animals at what time. As discussed with at our meeting with MPI, the technology exists for things like this, as it is currently used in milk collection.
39. **Stock transport – Animals that cannot bear weight evenly due to injury:** we support this proposal.
40. **Stock transport – Pregnant animals:** your second proposed wording seems to be clearer.
41. **Stock transport – Animals with injured or diseased udders:** we support this proposal.
42. **Stock transport – Cattle or sheep with cancer eye:** we support this proposal.

#### YOUNG CALF MANAGEMENT REGULATORY PROPOSALS

43. **Young calves – Loading and unloading facilities:** we support this proposal.  
**NOTE:** we query who is responsible for ensuring this happens, the farmer or the stock truck drivers?
44. **Young calves – Shelter on-farms, before and during transportation and at processing plants:** we support this proposal but given what we saw last calving season, we believe that there also needs to be some requirements around stocking density if calves are to be enclosed in small pens and crates prior to collection.  
**NOTE:** We believe that young calves should be given bedding while awaiting transport. We also believe that there should be limits to how long young calves are allowed to be kept in small pens, awaiting transport. We propose a maximum of two hours.
45. **Young calves – Fitness for transport – age:** we do not think that young calves should be transported before they are at least ten days old.

**NOTE:** We believe that young calves should also be given bedding during transport.

46. **Young calves – Fitness for transport – physical characteristics:** we support this proposal.

47. **Young calves – Maximum time off feed:** we would like to see the time off feed reduced.

**NOTE:** so that time off feed might be reduced, and that less stress might be placed on calves generally, we strongly recommend the implementation of mandatory same-day slaughter for all calves.

48. **Young calves – Duration of transport:** we support this proposal.

**NOTE:** we think that drivers should be trained on how to drive properly with young calves in their care.

49. **Young calves – Blunt force trauma:** we support this proposal.

50. **Young calves – Transport by sea across the Cook Strait:** we support this proposal.

#### SURGICAL AND PAINFUL PROCEDURES REGULATIONS PROPOSALS

51. **All animals – Hot branding:** we support this proposal.

52. **All animals – Embryo collection via exteriorised uterus:** we believe that the person doing this procedure should, at the very least, be under the supervision of a vet.

53. **All animals - Laparoscopic artificial insemination:** we support this proposal

54. **All animals – Liver biopsy:** we support this proposal.

55. **All animals – Dental work:** we support this proposal.

56. **Cats – declawing:** we support this proposal in principle but wonder what defines best interests? Does a veterinarian have to recommend it, for example?

57. **Companion animals:** we support this proposal. We wonder how companion animal is defined?

58. **Dogs – Freeze branding:** we would like to see a ban on this practice.

59. **Dogs – Dog debarking and devoicing of other species:** we support this proposal in principle but wonder what defines best interests? Does a veterinarian have to recommend it, for example?

60. **Dogs – Cropping the ears:** we support this proposal.

61. **Dogs – Dew claws:** we support this proposal for “therapeutic reasons” only.

62. **Dogs – Tail docking:** we believe that tail docking for any reason other than “therapeutic reasons” should be banned.

63. **Cattle – Teats:** we support this proposal.

64. **Cattle – Claw removal:** we support this proposal.



65. **Cattle – Teat occlusion:** we support this proposal.
66. **Cattle – Tail docking:** We support this proposal.
67. **Cattle and sheep – Castration and shortening of the scrotum:** we believe pain relief should be provided with this procedure at any age.
68. **Cattle, sheep & goats – Debudding:** we support this proposal.
69. **Cattle, sheep & goats – Dehorning:** we support this proposal.
70. **Sheep – Tail docking:** we support this proposal.
71. **Sheep – Mulesing:** we support this proposal.
72. **Deer – Develvetting:** we support this proposal.
73. **Horses – Blistering, firing or nicking:** we support this proposal.
74. **Horses – Tail docking:** we support this proposal.
75. **Horses – Rectal pregnancy diagnosis of horses:** we support this proposal.
76. **Horses – Rectal examination of horses:** we support this proposal.
77. **Horses – Caslick’s procedure:** we support this proposal.
78. **Horses – Castration:** we support this proposal.
79. **Llama and alpaca – Castration:** we support this proposal.
80. **Pigs – Castration:** we support this proposal.
81. **Pigs – Castration:** we believe that tail docking of pigs must be carried out with pain relief regardless of the piglet’s age.

**NOTE:** we understand that tail docking is undertaken to reduce levels of tail biting and cannibalism within pig farms. We believe that the environment provided to piglets/pigs should be sufficiently large and enriched that boredom and frustration does not lead to tail biting in the first place.

82. **Birds – Pinioning or otherwise deflighting a bird:** we support this proposal.
83. **Poultry – Dubbing:** we support this proposal.
84. **Ostriches & Emu – Declawing:** we support this proposal.
85. **Roosters – Caponising (rooster castration):** we support this proposal.

**From:** Sue Kurokawa § 9(2)(a)  
**Sent:** Monday, 16 May 2016 11:08 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Conditions for Bobby calves

I am an ordinary NZ citizen who believes conditions for the treatment of Bobby calves on NZ farms need to be vastly improved. No animal should EVER be thrown, these animals deserve care and respect. Bobby calves should not be transported before 10 days of age. When this happens, they should not be penned up in distress for too long. They need adequate bedding before and during transport. If they are to be slaughtered, this needs to happen as quickly as possible, as calmly as possible. Killing Bobby calves is definitely the worst part of the NZ dairy industry. Great care and responsibility needs to be taken to ensure the process is done as humanely as possible.

Yours faithfully, Sue Kurokawa, § 9(2)(a)

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982



Meat Industry Association of New Zealand (Inc)

Submission to the Ministry for Primary Industries

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

19 May 2016

**I: About the Meat Industry Association**

1. The Meat Industry Association ('MIA') is the voluntary trade association representing New Zealand meat processors and exporters.
2. New Zealand meat industry earned \$7.7 billion in export revenue in the year ended September 2015, and is New Zealand's second largest export industry. The industry processes around 28 million sheep and cattle every year, exporting more than one million tonnes of red meat and co-products to more than 120 markets around the world. MIA member companies operate processing plants throughout the country that employ 24,000 workers.
3. The MIA:
  - provides a collective voice for New Zealand's red meat processors and exporters;
  - facilitates policy formation on economic, trade policy, market access, industrial relations, compliance costs, environmental, animal welfare, technical and regulatory issues facing the industry;
  - coordinates a number of industry services, including whole-of-industry research and development; and
  - is the interface between the meat industry and government.

A list of Association members is attached as Appendix 1.



## II: Submission

4. The MIA supports a strong animal welfare regulatory framework. It is important that the animal welfare regulatory environment drives the confidence of the general public as well as demonstrating to the international community New Zealand's commitment to animal welfare and ethical farming practices.
5. The MIA broadly supports the thrust of the proposed changes outlined in the document 'Proposed Animal Welfare Regulations' and the objectives outlined in section 3.2. The processing industry supports the development of enforceable regulatory tools, including fines, as a step that incurs a penalty for poor animal welfare practices that would otherwise be below the threshold for a full prosecution in court.
6. While the MIA appreciates the urgency with respect to the proposed changes for young calves we have concern over the short consultation period (five weeks). MIA is also concerned that a number of the proposed changes will not materially improve animal welfare and are being promoted for reasons of political expediency – that is, a desire for MPI to be seen to be "doing something", rather than basing proposed regulations on evidence and proven improved animal welfare outcomes.
7. *Section 4: The Compliance and Enforcement regime*  
The MIA supports the introduction of the proposed infringement penalties for low level offending as outline in section 4. However we sound a note of caution. Unlike speeding offences or parking tickets (where there is a very clear line – a car is either over or under the speed limit), determining an animal welfare infringement is largely a matter of judgement by the officer. For example, an officer will be required to assess "the level of harm". If this regime is to work, then there needs to be both a consistent and transparent application and increased oversight. All parties will need to have information publicly available on what those "levels of harm" actually are. And MPI officers will need to have extensive training in determining those "levels of harm" in order to ensure consistency. This will require an investment by MPI in additional resource and increased enforcement training.
8. In the MIA's view, the defence of "preservation, protection, or maintenance of human life" is set far too high. Processors are subject to health and safety requirements, including an obligation under the Health and Safety at Work Act (HSWA) to protect workers and other persons against harm to their health, safety, and welfare. For MIA, the health and safety of the workers and other staff (including MPI staff) is paramount, and trumps animal welfare. We believe that the defence should be amended to "the act or omission constituting the offence was necessary to ensure that the health and safety of people is not put at risk."
9. *Section 6: Monitoring and review*  
MIA supports direct engagement between MPI and processors to ensure the consistent application of the new regulations. We believe the appropriate 'peak group' for the discussion of animal welfare issues for meat processors is the joint MPI-processor Strategic Directions Group (SDG).

10. *Section 10: Proposal 1: Electric Prodders*

The proposed regulation allows electric prodders to be used on cattle over 100kg, and other animals, in a commercial slaughter premises when the safety of the handler is at risk and when loading a stunning pen. The regulation should specifically state what animals other than cattle are covered by this section. It should include deer in these circumstances. The allowance for deer is included in the EU OMAR, and there is a very real health and safety risk by trying to enter the pen of a stubborn and agitated adult deer within confined stockyards facilities. This basis the use in commercial slaughter facilities is justified from a health and safety perspective and also from an animal welfare perspective.

11. *Section 11: Young Calf Management Regulatory Proposals*

The meat processing industry has been concerned about bobby calf animal welfare for some time. It is very pleased that regulations are being developed. The MIA has been facilitating a cross sector Bobby Calf Animal Welfare Working Group with the objectives to identify and objectively analyse the causes of welfare issues for bobby calves, and recommend solutions for ensuring that welfare of all bobby calves is maintained appropriately throughout the supply chain.

12. MIA supports the general thrust of the proposed changes outlined in section 11, including the definition of a young calf. We note that many of the proposals are simply putting into regulation existing minimum standards. However we have some specific concerns that a number of the proposed changes will not materially improve the animal welfare for the calf.

13. In general, the MIA supports most of the proposals associated with bobby calves including:

- Proposal 43. Young calves – loading and unloading facilities
- Proposal 44. Young calves – shelter on-farm, before and during transportation and at processing plants
- Proposal 45. Fitness for transport – age
- Proposal 46. Young calves – fitness for transport – physical characteristics
- Proposal 49. Young calves – blunt force trauma

14. *Section 11, Proposal 47: Young Calves Maximum Time Off Feed*

Reducing time off feed from the current 30 hours to 24 hours will not necessarily improve animal welfare outcomes. We note that the MPI paper states that "current scientific research has suggests [sic] that up to 30 hours off feed (the current limit in New Zealand) does not produce physiological harm on healthy calves." The current 30 hours is acceptable if the calves are appropriately prepared, i.e. adequately fed two hours prior to pick up, fit and healthy for transport as outlined in the codes. By reducing the time off feed to 24 hours we are not dealing to poor practices behind the farm gate. The existing standards provide for an appropriate level of animal welfare. Additionally, the MPI VS bobby calf procedures for 2016 allow for feeding of calves that arrive at the processing facilities that are showing signs of distress.

15. Additionally it is sometimes not practical for all plants processing bobby calves to process calves within a 24 hour period of receipt, for example;

- Resource management constraints, in which plants cannot operate beyond certain times;
- Shift configurations, in the shoulders of the season not all shifts are potentially operating

16. By not stipulating a minimum time for feeding prior to transport will require considerable additional processes and monitoring to be put in place as each farmer will be required to record the time of last feed, this will need to be recorded by the transporter at time of pick-up with each individual mob having its own 24 hour window depending on the time of last feed. This will impact all the way through to the processor to ensure that each mob is processed within the 24 hour window. Current practice is that the first pick-up of the 'lot' sets the 28 hour window. While there is potential for this to be handled via commercial arrangements between farmers and processors, 2016 commercial agreements are already in place and the effect implementing new regulations during a season would be extremely problematic.
17. The MIA remains of the view that feeding 2 hours prior to pick up is not "very difficult to achieve". What is required is improved communication between transporters and farmers. We do not believe that this is difficult to achieve in practice, and it should remain as the standard.
18. *Section 11, Proposal 48: Young Calves Duration of Transport*  
MIA remains of the view that the current 12 hour maximum transport time is not onerous providing the calves are prepared appropriately for transport. No evidence has been put forward that this change to 8 hours will result in an improvement in bobby calf welfare.
19. Additionally there are potential unintended consequences by reducing the maximum transport time including;
- Some farms, for example on the West Coast of the South Island, are potentially outside the 8 hour transport window to their nearest processor;
  - In the shoulders of the season a number of farms may be outside the maximum 8 hour window;
  - During peak season in intensive dairy regions calves need to be transported outside their region as processing capacity does not match high demand. While this increases transport time, it potentially minimises time off feed.
20. *Section 11, Proposal 50: Transport by Sea Across Cook Strait Prohibited*  
No evidence has been put forward that bobby calves crossing Cook Strait is a particular risk. MIA remains of the view that the current minimum standards are sufficient and providing that total accrued transport time does not exceed 12 hours then there should be no restrictions on transporting young calves across Cook Strait.

### III: Conclusion

21. MIA recommends that the defence should be amended to "*the act or omission constituting the offence was necessary to ensure that the health and safety of people is not put at risk.*"
22. We note that most of the proposed regulations are already existing New Zealand Animal Welfare Standards or else follow the practices undertaken in other western countries.
23. Proposed regulations 47, 48 and 50 (relating to transport time and time off feed) are without scientific evidence. It is the strong view of MIA that regulation should be evidence-based (especially given that that evidence is currently being obtained, as per below). We question what the rationale is for these proposed regulations.



24. MPI and industry are entering a 'data collection' phase with both the MPI/Massey work programme, as well as a 100% post mortem analysis at processors. Until the results are analysed, any changes in regulations for transport time and time off feed are premature. In its rush to be seen to be doing something, MPI is out of alignment with the research that should be underpinning the regulations.
25. The MIA is concerned that by imposing additional restrictions on time off feed and transport times there will be unintended consequences, with the potential for some calves unable to be commercially procured by processors, requiring the calves to be killed on the farm.
26. The MIA notes that if it is the intention of the Minister to introduce bobby calf regulations on the 1 August that the bulk of the 2016 season will be over thus having a limited impact on bobby calf animal welfare outcomes for the current season.
27. By delaying the implementation of the young calf regulations by 9 months, so that the new regulations come into force at the start of the 2017 season will allow the MIA, MPI and the dairy sector to finalise regulations using the evidence currently being obtained that will make a material and permanent improvement in bobby calf animal welfare and allow all parties in the value chain to implement the requirements of the new regulations for the start of the 2017 season.

#### IV: MIA Contact

28. For any queries relating to this submission, please contact Richard McColl, s 9(2)(a)

Meat Industry Association of New Zealand (Inc)

19 May 2016

## V: Appendix 1: Current Association Members and Affiliate Members

<b>Members</b>
Advance Marketing Ltd
AFFCO New Zealand Ltd
Alliance Group Ltd
ANZCO Foods Ltd
ANZPAC Foods Ltd
Auckland Meat Processors Ltd
Ballande New Zealand Ltd
Blue Sky Meats (NZ) Ltd
Clover Exports
Columbia Exports Ltd
Crusader Meats New Zealand Ltd
Davmet New Zealand Ltd
Fern Ridge Ltd
Greenlea Premier Meats Ltd
Harrier Exports Ltd
Lanexco Ltd
Lean Meats Oamaru Ltd
Lowe Corporation Ltd
Mathias International (Mathias Meats NZ Ltd)
Ovation New Zealand Ltd
Progressive Meats Ltd
Silver Fern Farms Limited
Tara Exports Ltd
Taylor Preston Ltd
Te Kuiti Meat Processors Ltd
Universal Beef Packers Ltd (UBP)

<b>Affiliate Members</b>
AgResearch-MIRINZ Centre
Aon New Zealand Limited
Bemis Flexible Packaging Australia
CentrePort Wellington
Diversey New Zealand Ltd
Ecolab PTY Ltd
Hamburg-Sud New Zealand Ltd
Hapag-Lloyd (New Zealand) Ltd
Intralox Ltd
Jasol New Zealand
Maersk New Zealand Ltd
Milmeq Ltd
Oceanic Navigation Ltd
Port of Napier
Port Otago Ltd
Pyramid Trucking Ltd
Sealed Air (New Zealand)
Scott Technology Ltd
Vero Marine Insurance
Wallace Corporation Ltd

**From:** § 9(2)(a)  
**Sent:** Monday, 16 May 2016 10:56 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** submission  
**Categories:** Blue Category

To the Ministry of Primary Industries,  
Submission on the regulations released for consultation in April 2016.

### Factory Farming

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 the Animal Welfare Act. The intent of the Animal Welfare Act is that animals should be able to exhibit, and not be restricted from displaying their natural behaviours. Factory farming conflicts with intent of the Act. NZ should be looking into the future and creating a plan to phase out and ban factory farming

Particularly, 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.

The arguments around cost and competitiveness are negated by a (defined) phase-in plan that puts all producers on an even playing field. NZ has adequate land for methods other than factory farming ( of chickens, eggs etc)

### Regulations around Young Calves

I also strongly require stringent requirements around the holding and transport of Bobby Calves. I was appalled, and want to voice that the NZ public collectively was appalled and are relying on the MPI to protect these calves from suffering

I want MPI to

- 1) introduce stringent new rules around the holding and transport of bobby calves
- 2) ensure chain of command documentation over holding and collection of bobby calves
- 3) I submit that MPI **differentiate between those farmers who supply bobby calves for Human Consumption, and those farmers who supply bobby calves for petfood, and other uses.**

My logic is that the bulk of Young Calves are destined for other than human consumption. The fact that slaughter is beyond the farm gate is causing immeasurable and unjustifiable distress, relative to the option of slaughtering these calves in-situ at the farm.



Where Bobby calves are not for human consumption, i submit that MPI investigate the option of requiring those farmers to slaughter bobby calves on-site, and store re Fridgerated carcasses for collection by trucking companies rather than live bobby calves. I would like a review around the practicalities of this option, using practical options for humane slaughter at the farm site, for those calves which are NOT for human consumption: This would eliminate the unnecessary suffering of these bobby calves, without detriment to the petfood product and with little or no extra cost to the farmer Costs to the farmer would be in the investment of freezers, rather than in holding pens, and oversight/feeding of distressed bobby calves..

This scenario is entirely legally possible (where meat is for petfood or other than human consumption)  
This scenario appropriately places responsibility with the farmer (where the meat is for petfood)

Then , MPI regulations around holding, feeding , transportation and slaughter can apply to those Young Calves destined for human consumption

My suspicion is, that those farmers who are supplying VEAL FOR HUMAN CONSUMPTION already have in place strict conduct around holding, transport and slaughter, as their suppliers already expect and require it?

If so, Why are these two industries treating young calves differently?

Yours sincerely  
Louise O'Callaghan

s 9(2)(a)

From: anne robson s 9(2)(a)  
 Sent: Thursday, 19 May 2016 2:36 a.m.  
 To: Animal Welfare Submissions  
 Subject: SUBMISSION ON ANIMAL WELFARE REGULATIONS

## MPI Animal Welfare Codes Submission

**Nathan Guy**  
**Minister for Primary Industries**

In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and I ask that a more realistic time frame be given for the public to have our say.

I suggest a period of five weeks be given to each section of the proposed welfare regulations.

While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, I ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare. I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

- 1) From 5.3m dairy cows in 2007 to 6.4m in 2012 (23% increase in just 5 years) Statistics NZ
- 2) Switzerland banned cages for hens in 1992

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on:</p> <ol style="list-style-type: none"> <li>a. the species and size of an animal</li> <li>b. the manner of use of an animal (circus)</li> <li>c. the location of the animal (slaughter premises)</li> </ol> <p>I support the proposed infringement penalty.</p>
2	All animals	Use of goads
		<p>I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.</p>
3	All animals	Twisting an animal's tail
		<p>I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.</p>

Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China
		The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for



		<p>further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across Cook Strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.</p>
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed
		<p>I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to &lt;4 degrees Celsius renders crustacean insensible and propose that either:</p> <p>a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR</p> <p>b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to &lt;4 degrees Celsius renders crustacean insensible.</p> <p>I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.</p>
13	Goats	Tethering requirements
		<p>I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ.</p> <p>I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500.</p> <p>I also propose that as goats are social animals all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300.</p> <p>1. Miranda-de la Loma, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10</p>
14	Horses	Use of a whip, lead, or any other object
		I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.
15	Horses	Injuries from equipment such as halter, head ropes and saddles
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.

16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met. 1) Sections 9, 68 Animal Welfare Act 1999
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully<sup>1</sup>. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens<sup>2</sup>. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes<sup>3</sup>) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> <li>• Sufficient length of perching space to allow all birds to perch at the same time; and</li> <li>• Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night.</li> </ul> <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. <i>'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'<sup>4</sup>.</i></p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens<sup>4</sup>. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage  2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57.  3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.  4) Cooper, J.J. and Abientosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>

20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		Proposal: I support the proposal that all pigs have access to a dry sleeping area. Penalty: I support the proposed infringement penalty of \$300.
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believe the formula intended by MPI should read "live weight<sup>0.67</sup> (kg)" but instead it reads "live weight 0.67(kg)" which translates to an Area = 0.03 * liveweight * 0.67(kg) and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. (2006) which ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI<sup>2</sup>. A k-value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen<sup>3</sup> not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage"<sup>4</sup>. If these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. I would like the regulations to be clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or</p>



		<p>close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m<sup>2</sup>) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m<sup>2</sup>) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spooler, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. <a href="http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr">http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr</a></p> <p>ibid. Page 9</p> <p>"ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 &lt;<a href="https://www.mpi.govt.nz/document-vault/1446">https://www.mpi.govt.nz/document-vault/1446</a>&gt;</p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC<sup>1</sup>. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates<sup>2,3</sup>.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>"National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 <a href="http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf">http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</a></p> <p>Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. <a href="http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042">http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</a></p> <p>KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. <a href="http://www.sciencedirect.com/science/article/pii/S0167587711003564">http://www.sciencedirect.com/science/article/pii/S0167587711003564</a></p>
28	Pigs	Provision of nesting material
		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust<sup>1</sup>.</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p>



		Chaloupková, H. "The effect of nesting material on the nest-building and maternal ... - NCBI." 2011. <a href="http://www.ncbi.nlm.nih.gov/pubmed/20889685">http://www.ncbi.nlm.nih.gov/pubmed/20889685</a>
29	Rodeos	Fireworks
		<p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010) And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 62,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses
		<p>I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.</p>
31	Cattle	Milk stimulation
		<p>I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.</p>
32	Cattle and Sheep	Vehicular traction in calving or lambing
		<p>I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.</p>
33	Cattle and Sheep	Ingrown horns
		<p>I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.</p>
34	Stock transport	Cuts and abrasions
		<p>I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.</p>
35	Stock transport	Animals with ingrown horns
		<p>I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.</p>

36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities
		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.



Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		Despite footage from 2015 clearly showing several different people throwing young calves during loading, only one individual was prosecuted in relation to the footage, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour. <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a> <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law. <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>
Proposed	Young Calves	Same day slaughter
		I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.
Proposed	Young Calves	Use of nearest slaughterhouse
		Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law. Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84
44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.
45	Young Calves	Fitness for transport – age

		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age; therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper<sup>1</sup> does not demonstrate that:</p> <p>this is in fact the case in calves &lt;5 days of age or</p> <p>that these calves are not experiencing significant hunger or</p> <p>that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study<sup>2</sup></p> <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves<sup>1</sup> we propose an increase in the infringement penalty to \$1000.</p> <p>Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.
50	Young Calves	Transport by sea across Cook Strait prohibited
		I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.
Surgical and painful procedures regulatory proposals		

51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I propose that all cats and dogs sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding
		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.



59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure 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 this procedure.
63	Cattle	Teats
		I support the proposal for supernumerary teat removal of animals >6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals <6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that: the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age i) infringement penalty of prosecution pain relief is required for any supernumerary teat removal procedure regardless of age ii) infringement penalty of prosecution procedure is performed using sterilised equipment iii) infringement penalty of \$500 any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian iv) infringement penalty of prosecution
64	Cattle	Claw removal
		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.
65	Cattle	Teat occlusion
		I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking

		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking
		I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking. Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months. I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male. I support the proposed penalty of prosecution for infringements in sheep > 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use.

		I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep < 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep <2 months of age and a penalty of \$300 for lack of NSAID use.
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses
		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty. I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.
79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.
80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-



		steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.

Yours sincerely

Anne Robson

s 9(2)(a)

**From:** Timoti § 9(2)(a)  
**Sent:** Monday, 16 May 2016 8:42 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal welfare regulations

I agree with the proposed animal welfare regulations for bobby calves... Would love to see these come to fruition.  
Kindest regards  
Laura bary  
Sent from my iPhone

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

## Submission on: Proposed Animal Welfare Regulations (Care & Conduct and Surgical & Painful Procedures)

This submission has been prepared by Alan Thatcher BVSc

Address for service:

Massey University Equine and Farm Services, s 9(2)(a)

Email s 9(2)(a)

This submission deals mostly with transport of animals, particularly cattle. For convenience, the paragraphs below are numbered according to the numbering system of the discussion document.

### 1. Electric prodders.

Although I have commonly observed excessive use of prodders by truck drivers loading cattle, restrictions may merely lead to excessive use of a length of alkathene. The code (for very stubborn cattle (but not calves)) probably needs to be added to the regulation, even at the risk of diluting its intent.

### 3. Twisting an animal's tail.

Proposal may be unenforceable for the reasons given in the discussion document. It takes a lot of force to break a cow's tail and is more likely to be associated with impatience rather than a deliberate act. That is of course, no excuse, but existing legislation covers this. Tail jacking is commonly used to ensure operator safety for various procedures – any regulation needs to be carefully worded to ensure "routine" tail jacking is distinguished from excessive force.

### 32. Vehicular traction.

I strongly support this proposal

### 33. Ingrown horns

*At what point is it reasonable to assume an ingrown horn should have been noticed and treatment provided?* Hopefully with dairy cattle being observed daily, this should not be an issue. The same applies to lowland beef. However, extensively run beef cattle may not be closely observed for extended periods.

*Does the definition 'touching skin or eye' leave open the possibility for more severe ingrown horns e.g. 'penetrating eye or skull' to be prosecuted as currently? Yes*

*At what point does horn shortening (removing dead horn) become dehorning? Can you tell beforehand with confidence?* It becomes dehorning if soft tissue at the centre of the horn is disrupted thus causing pain. It is not easy to judge exactly how far down the horn the soft tissue extends since there is considerable individual variation.

*Will the wound from ingrown horns require a period to heal before transport?* Yes, since the wound is open. Length of time to wound closure depends on depth and/or the presence of infection. It may vary from 24 hours for a simple clean wound to an extended period if infection has established on the skull.

### 35. Cuts and abrasions.

There is no excuse for backrub. Both owner and operator of the truck need to be liable as pen design is a contributing factor. \$500 may not necessarily be an effective deterrent whereas loss of licence would be.

Injury prevention: I note NZ is one of the few countries that does not mandate grids or roofing on the top of trucks to prevent animals attempting to climb out. Although not common, the consequences could be severe should an animal successfully escape or be injured, for example, while the truck is passing under a low bridge or tree branches.



38 and 39. Lamé cattle, deer, pigs, goats

- *Should sheep be excluded from this regulation? There is a systemic sheep lameness problem and as yet no agreed solution to manage lameness in sheep.* This can be addressed by drafting and treating lame sheep before transport. Alternatively, if being transported to slaughter, it should be to the nearest premises.
- *Transport can exacerbate lameness. Can the situation be adequately managed where animals may not be noticeably lame when loaded but become lame during transport?* Presumably this means a Grade 1 lameness converting to a Grade 2 during transport. Transport to the nearest available premises would address this.
- *Who should ultimately be liable for transporting a lame animal – the owner, or the transporter?* The person in charge.
- *Are there situations where an animal that is lame due to injury needs to be transported but it is impractical to obtain a veterinary certificate?* An emergency or natural disaster situation (eg flooding)

40. Pregnant animals.

I note that it is common for heavily pregnant cattle to be transported from farm to farm, ie from a grazing-off area to the home farm. This can sometimes be a considerable distance, including across Cook Strait, which heightens the risk of a birth occurring while under way. Any regulation governing maximum travel time for animals, say over 90% of gestation would be difficult to enforce given current MPI policy on monitoring but would send a message that this is unacceptable. Additionally, there is some evidence transport of cattle in late gestation may have an effect on the stress response and immune competence of the neonate, not a good situation if that neonate is subsequently transported.

Recommendation: reword the proposal to make clear it covers all movement of heavily pregnant cattle, not just those for slaughter (present wording is ambiguous). Place a maximum travel time of 12 hours on cattle at 90% of gestation or over. Prohibit transport by sea across Cook Strait. Reason: cattle need at least 8 hours per day lying time (prefer 11 hours), especially in the latter stages of pregnancy. A 12 hour limit should minimise stress in this regard.

#### Young Calves

Many young calves are transported for sale, not just slaughter, a significant number via saleyards. It must be made clear these regulations cover these circumstances too. Saleyards are a stressful experience, facilities must be adequate. Feed intervals and total travel time must include travel to the yards and subsequent travel to the destination farm.

44. Shelter.

This requires some consideration – “clean and dry” is not a common feature of stock trucks and young calves need to have sufficient space to lie down during prolonged transport. The problem could be minimised by minimising transport time (see below).

46. Fitness for transport

Recommendation: Add “firm faeces” to the list of criteria. Reason: Although diarrhoea may be covered by the requirement to be “free of disease”, it would be useful to specify faecal consistency to ensure attention is drawn to it.

#### 47 and 48. Time off feed and duration of transport

These two are interlinked.

#### Recommendations:

- That calves less than 14 days old being transported for slaughter must be taken to the nearest practical facility and in any case, whether calves are being transported for slaughter or for sale, the total length of time of transport must not exceed 8 hours.
- That the minimum liveweight of these calves must be 25 kg
- That a form stating the time of last feed and that the calves are fit for transport, signed by the person in charge, must be given to or left accessible for the truck driver. If calves are being transported privately, at termination of transport the form must be handed to the next person in charge.
- Whether calves are being transported for slaughter or for sale, time between feeds must not exceed 18 hours

#### Reasons:

Neonatal calves have not developed the physiological adaptability to cope with environmental extremes. If deprived of feed, maintenance of critical body temperature becomes difficult (Shrama *et al* 1993). For those being presented for sale, there is a relationship between total time of transport/marketing and the risk of subsequent development of disease or mortality (Eicher 2001).

Loading and unloading appear to have the most stress on neonates. However, due to poorly developed physiological parameters in very young animals, the establishment of an accurate measure of stress such as serum cortisol concentrations (used in older animals) is somewhat problematic. However, it seems likely that the shorter the distance travelled, the better calves are able to deal with the stress of unloading and processing.

#### Further Issues

It is somewhat disappointing that length of time of transport for animals other than bobby calves has not been addressed in these proposals. I would suggest this is a much more significant issue than some of those raised in the discussion document. Up until some years ago, the majority of animals were slaughtered in local facilities. However there have been some major changes in the meat industry which have resulted in animals typically being transported much longer distances. These changes feature:

- A decline in the number of slaughter facilities
- The expectation that maximising the use of facilities will maximise economic return
- Improved return to farmers if they are willing to "shop around" amongst works buyers

However this has led to:

- Compromised welfare of animals transported long distances
- A decline in the quality of logistics since it is not uncommon for identical classes of animals to be transported simultaneously in opposite directions
- A decline in the returns to transport companies
- A significantly heightened biosecurity risk

A recent survey carried out by Laven (2016) on factors associated with adult cattle recumbency at slaughter premises found risk was strongly correlated to both calcium serum concentration and distance transported. This is a significant problem in NZ, affecting some 1000 cows per year. Transport distances ranged up to 825km which seems somewhat unnecessary. Wild (2012) recommends adequate preparation for cows being transported including supplementation with magnesium. However Laven found no link between serum magnesium and the risk of recumbency.

There is conflicting evidence as to whether it is time or distance of travel that is most closely correlated with stress for adult cattle (Eicher 2001). Confounding the evidence is the multifactorial nature of transport-induced stress including stocking density, conflict between animals closely penned, nature of the ride, ambient temperature, ventilation etc. However, whether it is time or distance that is most important is probably irrelevant for this discussion as it appears that, although both are significant, time is the factor that would be most easily mandated.

#### Recommendation

That a full review of the factors associated with the distance adult animals are transported be carried out with a view to restricting time of transport to slaughter.

#### References

Eicher, SD: Transportation of cattle in the dairy industry: current research and future directions. J Dairy Sci. 84 Supp: E19-E23 (2001)

Laven RL: Recumbency at slaughter premises: a case control study. *In publication*

Schrama, J. W., A. Arieli, W. Van der Hel, and M.W.A. Verstegen: Evidence of increasing thermal requirement in young, unadapted calves during 6 to 11 days of age. J Anim Sci. 71:1761-1766 (1993)

Wild R: When cows go down during transit to slaughter. Vetscript. June 2012

16 May 2016



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Direct Animal Action

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## MPI Animal Welfare Codes Submission

Nathan Guy

Minister for Primary Industries

In response to MPI's request for feedback on proposed animal welfare regulations we submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and we ask that a more realistic time frame be given for the public to have our say.

We suggest a period of five weeks be given to each section of the proposed welfare regulations. While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, we ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history<sup>1</sup>. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare<sup>2</sup>. We want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

- 1) From 5.3m dairy cows in 2007 to 6.4m in 2012 (23% increase in just 5 years) Statistics NZ
- 2) Switzerland banned cages for hens in 1992

Sincerely, DAA (Direct Animal Action).

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>DAA proposes that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>DAA does not support exemptions on the use of prodders based on:</p> <ul style="list-style-type: none"> <li>a. the species and size of an animal</li> <li>b. the manner of use of an animal (circus)</li> <li>c. the location of the animal (slaughter premises)</li> </ul> <p>DAA supports the proposed infringement penalty.</p>
2	All animals	Use of goads
		<p>DAA supports the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas DAA proposes an increased infringement penalty of \$500.</p>
3	All animals	Twisting an animal's tail
		<p>DAA supports the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act DAA propose the infringement penalty is set at the higher level of \$500.</p>
Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. DAA proposes a regulatory proposal as stated above. DAA proposes the offence to be an infringement with a fine set at \$1000</p>

		<p>to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
4	Dogs	Pinch and Prong collars
		DAA supports the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. DAA supports the proposed infringement penalty of \$300. DAA also supports the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		DAA supports the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars DAA proposes the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		DAA supports the proposal for regulating the use of muzzles so they do not cause injury or distress. DAA supports the inclusion in the proposal that muzzles should allow for a dog to be able to drink. DAA supports the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		DAA supports the proposal for dogs to have access to dry and shaded shelter at all times. DAA proposes the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore DAA propose the infringement penalty to be increased to a prosecutable offence. We also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding this time.
8	Dogs	Dogs left in vehicles
		DAA supports the proposal for people leaving dogs in vehicles to ensure their safety. DAA proposes increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to



		act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		DAA supports the proposal to secure dogs on moving vehicles. DAA proposes including dogs on vehicles on private property in the regulation, and proposes a speed limit of 40kph for vehicles carrying unsecured working dogs. DAA proposes increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China
		The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across cook strait. DAA propose the above regulation and propose the infringement penalty is set at a prosecutable offence.
10	Dogs and Cats	Drowning dogs and cats
		DAA supports the prohibition of the killing of a dog or cat of any age by drowning. DAA supports the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		DAA supports the proposal that eels must be insensible for desliming or killed before they are deslimed. DAA supports the infringement penalty of a prosecutable offence.
12	Crabs,	Insensible before being killed

	rock lobster and crayfish	
		<p>DAA supports the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. DAA disputes the NAWAC statement that chilling to &lt;4 degrees Celsius renders crustacean insensible and proposes that either:</p> <p>a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR</p> <p>b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to &lt;4 degrees Celsius renders crustacean insensible.</p> <p>DAA supports the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.</p>
13	Goats	Tethering requirements
		<p>DAA does not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and proposes that tethering is prohibited with an infringement penalty of \$500. Furthermore DAA shares concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ.</p> <p>DAA proposes that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500.</p> <p>DAA also proposes that as goats are social animals<sup>1</sup> all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. DAA proposes that failure to house a goat with a companion should attract an infringement penalty of \$300.</p> <p>1. Miranda-de la Lama, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10</p>
14	Horses	Use of a whip, lead, or any other object

		DAA supports the prohibition of using a whip, lead or other object to strike around the head. DAA supports the proposed infringement penalty of \$300.
15	Horses	Injuries from equipment such as halter, head ropes and saddles
		DAA supports the proposal to ensure that equipment is used in a manner that does not result in injury or distress. DAA supports the proposed infringement penalty of \$300.
16	Horses and Donkeys	Tethering requirements
		DAA does not support the tethering of horses and donkeys and proposes that tethering is prohibited with an infringement penalty of \$300. DAA proposes that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		DAA believes that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met <sup>1</sup> .  1) Sections 9, 68 Animal Welfare Act 1999
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads



	<p>and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq. cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully<sup>1</sup>. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens<sup>2</sup>. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes<sup>3</sup>) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> <li>• Sufficient length of perching space to allow all birds to perch at the same time; and</li> <li>• Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night.</li> </ul> <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. <i>'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'<sup>4</sup>.</i></p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens<sup>4</sup>. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1). A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage  2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57.  3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.  4) Cooper, J.J. and Ablentosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>
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20	Layer Hens	Induced moulting
		DAA supports the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		DAA supports the proposal to ensure that equipment is used in a manner that does not result in injury or distress. DAA supports the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		DAA supports the proposal that camelids must be provided with a companion animal. DAA supports the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		DAA supports the proposal to prohibit raising Cria without the company of other camelids. DAA supports the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		<p>Proposal: DAA supports the proposal that all pigs have access to a dry sleeping area.</p> <p>Penalty: DAA supports the proposed infringement penalty of \$300.</p>
25	Pigs	Lying space for grower pigs
		<p><b>Proposal:</b> DAA supports the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. DAA believes the formula intended by MPI should read "live weight 0.67(kg)"</p>

but instead it reads "live weight 0.67(kg)" which translates to an Area =  $0.03 * \text{liveweight} * 0.67(\text{kg})$  and results in a much higher space requirement.

**Therefore DAA contends that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.**

## 2. Minimum requirement

Recent research suggests that a k- value of 0.3 is too low. In 2006, Gonyou et al. (2006)<sup>1</sup> which ADFI is reduced. More recently, a 2015 study has found that a k- value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI<sup>2</sup>.

A k- value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.

### **Does the proposal adequately define the appropriate systems?**

The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen<sup>3</sup> not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.

DAA considers the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage" <sup>4</sup>. If these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.

The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. DAA is concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. DAA would like the regulations to be clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010



		<p>review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k- value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, DAA suggests that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, DAA proposes that the minimum standard is amended to:</p> <p><b>Grower pigs housed inside on non- litter systems such as slatted or solid floors must have lying space of at least: Area (m2) per pig = 0.040 x live weight 0.67(kg)</b></p> <p><b>Grower pigs housed inside on non- litter systems such as slatted or solid floors must not have lying space of less than: Area (m2) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</b></p> <p><b>Penalty:</b> DAA supports penalty of a prosecutable regulation offence.</p> <p>Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier- Salaun, R. B. Morrison, H. Spooler, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken- line analysis to assess floor space requirements of nursery and grower- finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229- 235.</p> <p>Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015.  <a href="http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr">http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr</a>          ibid. Page 9          "ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT."          2015. 15 May. 2016 &lt;<a href="https://www.mpi.govt.nz/document-vault/1446">https://www.mpi.govt.nz/document-vault/1446</a>&gt;</p>
26	Pigs	Dry sow stalls
		<p>Proposal: DAA supports the prohibition of dry sow stalls.</p> <p>Penalty: DAA supports the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		Proposal: DAA does not support the use of farrowing crates.

		<p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub- optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC<sup>1</sup>. In that report, NAWAC stated that “no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued”. It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates<sup>2,3</sup>.</p> <p>DAA submits that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>"National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 <a href="http://www.nzpork.co.nz/images/custom/farrowing- crate- advice- 14- march- 2016.pdf">http://www.nzpork.co.nz/images/custom/farrowing- crate- advice- 14- march- 2016.pdf</a></p> <p>Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. <a href="http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042">http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</a></p> <p>Kilbride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. <a href="http://www.sciencedirect.com/science/article/pii/S0167587711003564">http://www.sciencedirect.com/science/article/pii/S0167587711003564</a></p>
28	Pigs	Provision of nesting material
		<p>Proposal: DAA supports the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>DAA agrees that the definition of manipulable material should be made more apparent. “Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour” would be appropriate. However, for clarity, DAA recommends that</p>



		<p>examples are provided for guidance. Appropriate examples would include straw and sawdust<sup>1</sup></p> <p>Penalty: DAA supports the proposed infringement penalty of prosecution.</p> <p>Chaloupková, H. "The effect of nesting material on the nest- building and maternal ... - NCBI." 2011.  <a href="http://www.ncbi.nlm.nih.gov/pubmed/20889685">http://www.ncbi.nlm.nih.gov/pubmed/20889685</a></p>
29	Rodeos	Fireworks
		<p>DAA supports the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010) And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>DAA would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 62,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses
		<p>DAA does not support the use of exotic animals in circuses and proposes that their use be banned. Given that there are currently no</p>



		circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.
31	Cattle	Milk stimulation
		DAA supports the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. DAA propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. DAA supports the proposed infringement penalty of \$300.
32	Cattle and Sheep	Vehicular traction in calving or lambing
		DAA supports the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. DAA supports the proposed infringement penalty of \$500.
33	Cattle and Sheep	Ingrown horns
		DAA supports the proposal to require treatment for horns that are touching the skin or eye. DAA supports the proposed infringement penalty of \$500.
34	Stock transport	Cuts and abrasions
		DAA supports the proposal that transport should not result in cuts or abrasions. DAA propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. DAA supports the infringement penalty of \$500.
35	Stock transport	Animals with ingrown horns
		DAA supports the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. DAA supports the proposed infringement penalty of \$500.
36	Stock	Animals with bleeding horns or antlers

	transport	
		DAA supports the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. DAA supports the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		DAA supports the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. DAA could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. DAA propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. DAA supports the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		DAA supports the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. DAA supports the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		DAA supports the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. DAA supports the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		DAA supports the proposal that animals who are in late stages of pregnancy should not be transported. DAA propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. DAA supports the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		DAA supports the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. DAA

		propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. DAA supports the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		DAA supports the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. DAA propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. DAA supports the infringement penalty of \$500.
<b>Young calf management regulatory proposals</b>		
43	Young Calves	Loading and unloading facilities
		DAA supports the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain DAA proposes that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. DAA proposes a regulatory proposal as stated above. DAA proposes the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p><a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves



		<p>DAA proposes a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading<sup>1</sup>. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. DAA proposes infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p><a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a></p>
Proposed	Young Calves	Same day slaughter
		<p>DAA proposes that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves DAA considers reducing holding time to a minimum as the least bad of the options. DAA proposes an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p>
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves<sup>1</sup>. For this reason DAA proposes that calves are required to be slaughtered at the closest slaughter premises. DAA proposes the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
44	Young Calves	Shelter on farm, before and during transportation and at processing plants

		DAA supports the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. DAA supports the higher proposed infringement penalty of prosecution.
45	Young Calves	Fitness for transport – age
		<p>DAA proposes that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age<sup>1</sup> therefore DAA proposes that the absolute minimum age of transport be set at 5 days of age. DAA supports the most conservative determination of age – that it is determined from the time the calf is separated from the dam. DAA supports the higher proposed infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		DAA supports the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. DAA supports the higher proposed infringement penalty of prosecution.
47	Young Calves	Maximum time off feed
		<p>DAA supports the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper<sup>1</sup> does not demonstrate that:</p> <p>this is in fact the case in calves &lt;5 days of age or</p> <p>that these calves are not experiencing significant hunger or</p> <p>that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study<sup>2</sup></p> <p>DAA proposes that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. DAA proposes an infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A.</p>

		and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134. Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.
48	Young Calves	Duration of transport
		DAA supports limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves <sup>1</sup> we propose an increase in the infringement penalty to \$1000. Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84
49	Young Calves	Blunt force trauma
		DAA supports the prohibition of the use of blunt force trauma for killing calves. DAA supports the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.
50	Young Calves	Transport by sea across Cook Strait prohibited
		DAA supports the prohibition of transport of young calves across Cook Strait. DAA supports the more severe penalty of prosecution as this allows corporations to be held accountable.
<b>Surgical and painful procedures regulatory proposals</b>		
51	All animals	Hot branding
		DAA supports the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		DAA does not support the collection of embryos via exteriorised uterus



		and proposes to prohibit the practice. In the event that it is not prohibited then DAA proposes that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then DAA supports the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright DAA proposes that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		DAA does not support the use of laparoscopic AI and proposes to prohibit the practice. In the event that it is not prohibited then DAA proposes that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then DAA supports the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright DAA proposes that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		DAA supports the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. DAA supports the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		DAA supports the proposal that any power tool used for dental work must be designed for the purpose of dentistry. DAA propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		DAA supports the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. DAA proposes that to ensure the procedure is always performed in the animal's best interest a

		consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However DAA recognises this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. DAA supports the proposed penalty of a prosecutable offence.
57	Compani on animals	Desexing (including stray/feral cats, dogs and other species)
		DAA supports the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. DAA supports the proposed penalty of a prosecutable offence. We purpose that all cats and dogs sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding
		DAA proposes that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited DAA supports the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. DAA supports the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		DAA supports the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. DAA proposes that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However DAA recognises this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. DAA supports the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		DAA supports the proposal to prohibit ear cropping of dogs. DAA

		supports the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		DAA supports the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. DAA proposes restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. DAA supports the proposed penalty of prosecution.
62	Dogs	Tail docking
		We support the docking of tails in dogs for therapeutic reasons only. The procedure 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 this procedure.
63	Cattle	Teats
		<p>DAA supports the proposal for supernumerary teat removal of animals &gt;6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. DAA does not support the removal of supernumerary teats in animals &lt;6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). DAA proposes that:</p> <p>the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age</p> <p>i) infringement penalty of prosecution pain relief is required for any supernumerary teat removal procedure regardless of age</p> <p>ii) infringement penalty of prosecution procedure is performed using sterilised equipment</p> <p>iii) infringement penalty of \$500 any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian</p> <p>iv) infringement penalty of prosecution</p>
64	Cattle	Claw removal
		DAA supports the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. DAA proposes that in addition to the pain relief at the time of the procedure additional non-steroidal anti-



		inflammatory drug (NSAID) pain relief is also administered. DAA supports the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.
65	Cattle	Teat occlusion
		DAA supports the proposal that teat sealing can only be performed with a product registered for that specific purpose. DAA supports the infringement penalty of prosecution.
66	Cattle	Tail docking
		DAA supports the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. DAA proposes that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. DAA supports the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		DAA supports the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. DAA supports the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. DAA does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, DAA supports limiting the manner of non-surgical castration to only the use of conventional rubber rings. DAA does not support performing non-surgical castration without pain relief at any age and proposes that pain relief is required for any castration procedure at any age. DAA proposes that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. DAA proposes that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding

		DAA proposes that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). DAA proposes that appropriate maximum ages are determined for disbudding to be performed by a lay person. DAA supports the use of pain relief during the procedure and proposes that additional NSAID pain relief is also administered. DAA supports the proposed penalty of prosecution for lack of use of pain relief and proposes an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		DAA proposes that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding DAA proposes that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. DAA supports the use of pain relief during the procedure and proposes that additional NSAID pain relief is also administered. DAA supports the proposed penalty of prosecution for lack of use of pain relief and proposes an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking
		DAA supports the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. DAA supports the use of pain relief during the procedure and proposes that additional NSAID pain relief is also administered. DAA supports restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. DAA proposes that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking. Furthermore DAA proposes that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months. DAA supports the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male. DAA supports the proposed penalty of prosecution for infringements in sheep > 2 months of age and proposes an infringement penalty of \$300 for lack of NSAID use.

		DAA supports the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep < 2 months of age. DAA propose a penalty of prosecution for not using pain relief in sheep <2 months of age and a penalty of \$300 for lack of NSAID use.
71	Sheep	Mulesing
		DAA supports the proposal to prohibit mulesing. DAA support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		DAA supports the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. DAA supports the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		DAA supports the proposal to prohibit blistering, firing or nicking, and supports the proposed infringement penalty.
74	Horses	Tail docking
		DAA supports the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. DAA supports the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		DAA supports the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. DAA supports the proposed infringement penalty.
76	Horses	Rectal examination of horses
		DAA supports the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. DAA supports the proposed infringement penalty.
77	Horses	Caslick's procedure
		DAA supports the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. DAA supports the proposed infringement penalty. DAA propose that a caslick's procedure may only be performed for



		therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.
78	Horses	Castration
		DAA supports the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. DAA supports the proposed infringement penalty.
79	Llama and alpaca	Castration
		DAA supports the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure, and the minimum age for the procedure. DAA supports the proposed infringement penalties for these infringements.
80	Pigs	Castration
		DAA supports the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. DAA supports the infringement penalty of prosecution. DAA proposes that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		DAA proposes that pain relief should be used for this procedure regardless of the animal's age. DAA supports limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. DAA proposes that a NSAID should also be administered at the time of the procedure. DAA proposes an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. DAA propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		DAA supports the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the

		use of pain relief at the time of the procedure. DAA supports the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		DAA supports the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. DAA opposes the surgical modification of an animal if the modification is not in the interests of the animal, therefore DAA proposes that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		DAA supports the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. DAA proposes that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. DAA supports the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		DAA supports the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. DAA supports the proposed penalty of a prosecutable offence.

s 9(2)(a)

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Ministry Primary Industries  
P.O. Box 2526  
Wellington 6140

9/4/16

Submission on welfare of bobby calves.

Dear Sir,

My name is s 9(2)(a). I calve

1300 Cows in mid July. Some 600 of those calves are sent to a pet food abattoir.

My submission is based around the fact that one set of rules doesn't fit everyone.

The pet food abattoir is 15 minutes drive from our farm so the term fit for travel, in our case, does not mean 4 days old. We presently transport calves to the abattoir in a purpose built trailer at 2 days old. The calves are content and alert and healthy.

I don't believe I am doing anything that causes harm to the calf. I don't want generic rules passed that would add extra costs to my business.

Fit for travel does not mean 4 days old in all circumstances.

Yours faithfully

s 9(2)(a)



**From:** Wendy Cuiffe s9(2)(a)  
**Sent:** Thursday, 19 May 2016 7:18 a.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations

**Categories:** Blue Category

In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and I ask that a more realistic time frame be given for the public to have our say.

I suggest a period of five weeks be given to each section of the proposed welfare regulations.

While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, I ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history<sup>1</sup>. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare<sup>2</sup>. I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

1) From 5.3m dairy cows in 2007 to 6.4m in 2012 (23% increase in just 5 years) Statistics NZ

2) Switzerland banned cages for hens in 1992

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life" I do not support exemptions on the use of prodders based on: a. the species and size of an animal b. the manner of use of an animal (circus) c. the location of the animal (slaughter premises) I support the proposed infringement penalty.
2	All animals	Use of goads
		I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.
3	All animals	Twisting an animal's tail
		I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.
Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		Despite footage from 2015 clearly showing several different people throwing young calves during loading <sup>1</sup> , only one individual was prosecuted in relation to the footage <sup>2</sup> .



		<p>presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China
		The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI

		have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across Cook Strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed
		I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to <4 degrees Celsius renders crustacean insensible and propose that either: a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to <4 degrees Celsius renders crustacean insensible. I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.
13	Goats	Tethering requirements
		I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ. I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500. I also propose that as goats are social animals, all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300. 1. Miranda-de la Lama, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10
14	Horses	Use of a whip, lead, or any other object
		I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.
15	Horses	Injuries from equipment such as halter, head ropes and saddles
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at



		all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		<p>I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met<sup>1</sup>.</p> <p>1) Sections 9, 68 Animal Welfare Act 1999</p>
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully<sup>1</sup>. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens<sup>2</sup>. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes<sup>3</sup>) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> <li>• Sufficient length of perching space to allow all birds to perch at the same time; and</li> <li>• Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night.</li> </ul> <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. 'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'<sup>4</sup>.</p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens<sup>4</sup>. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage  2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57.  3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.  4) Cooper, J.J. and Ablentosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>
20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.

21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		Proposal: I support the proposal that all pigs have access to a dry sleeping area. Penalty: I support the proposed infringement penalty of \$300.
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believe the formula intended by MPI should read "live weight<sup>0.67</sup> (kg)" but instead it reads "live weight 0.67(kg)" which translates to an Area = 0.03 * liveweight * 0.67(kg) and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. (2006) which ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI<sup>2</sup>. A k-value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen; not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage" <sup>4</sup>. If these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. I would like the regulations to be clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p>



		<p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m<sup>2</sup>) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m<sup>2</sup>) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>1) Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spoolder, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>2) Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. <a href="http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesr">http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesr</a></p> <p>3) ibid. Page 9</p> <p>4) "ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 &lt;<a href="https://www.mpi.govt.nz/document-vault/1446">https://www.mpi.govt.nz/document-vault/1446</a>&gt;</p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC<sup>1</sup>. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates<sup>2,3</sup>.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>1) "National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 <a href="http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf">http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</a></p> <p>2) Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. <a href="http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042">http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</a></p> <p>3) KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. <a href="http://www.sciencedirect.com/science/article/pii/S0167587711003564">http://www.sciencedirect.com/science/article/pii/S0167587711003564</a></p>
28	Pigs	Provision of nesting material
		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust.</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p>



		1) Chaloupková, H. "The effect of nesting material on the nest-building and maternal ... - NCBI." 2011. <a href="http://www.ncbi.nlm.nih.gov/pubmed/20889685">http://www.ncbi.nlm.nih.gov/pubmed/20889685</a>
29	Rodeos	Fireworks
		<p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010) And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 62,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses
		I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.
31	Cattle	Milk stimulation
		I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.
32	Cattle and Sheep	Vehicular traction in calving or lambing
		I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.
33	Cattle and Sheep	Ingrown horns
		I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.
34	Stock transport	Cuts and abrasions
		I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.
35	Stock transport	Animals with ingrown horns

		I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities



		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		<p>I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading<sup>1</sup>. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a></p>
Proposed	Young Calves	Same day slaughter
		<p>I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p>
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves<sup>1</sup>. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.



45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age; therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper does not demonstrate that:</p> <ul style="list-style-type: none"> <li>a) this is in fact the case in calves &lt;5 days of age or</li> <li>b) that these calves are not experiencing significant hunger or</li> <li>c) that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study<sup>2</sup></li> </ul> <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>2) Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves we propose an increase in the infringement penalty to \$1000.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.
50	Young Calves	Transport by sea across Cook Strait prohibited
		I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.

Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I propose that all cats and dogs sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding

		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure 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 this procedure.
63	Cattle	Teats
		<p>I support the proposal for supernumerary teat removal of animals &gt;6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals &lt;6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that:</p> <ul style="list-style-type: none"> <li>a) the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age <ul style="list-style-type: none"> <li>i) infringement penalty of prosecution</li> </ul> </li> <li>b) pain relief is required for any supernumerary teat removal procedure regardless of age <ul style="list-style-type: none"> <li>ii) infringement penalty of prosecution</li> </ul> </li> <li>c) procedure is performed using sterilised equipment <ul style="list-style-type: none"> <li>iii) infringement penalty of \$500</li> </ul> </li> <li>d) any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian <ul style="list-style-type: none"> <li>iv) infringement penalty of prosecution</li> </ul> </li> </ul>
64	Cattle	Claw removal
		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.



65	Cattle	Teat occlusion
		I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking
		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking
		I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking.

		<p>Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months.</p> <p>I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male.</p> <p>I support the proposed penalty of prosecution for infringements in sheep &gt; 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use.</p> <p>I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep &lt; 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep &lt;2 months of age and a penalty of \$300 for lack of NSAID use.</p>
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses
		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		<p>I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty.</p> <p>I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.</p>
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.
79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the

		time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.
80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.



**From:** Marta Viv <sup>s 9(2)(a)</sup>  
**Sent:** Thursday, 19 May 2016 1:22 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Submission on Animal Welfare Regulations  
**Attachments:** MPI submission.pdf

**Categories:** Blue Category

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.

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.

Finally, please, find attached a backed-up of arguments specific to individual proposals, reasoned with literature reviews.

Best Regards,

Marta Vivancos

<sup>s 9(2)(a)</sup>

**Re Proposal 48. Young calves-Duration of transport + Lack of regulations around transportation for all livestock**

***Room to display normal behaviour and space to lie down simultaneously***

***Time restrictions for transport of all animals (8 hours or nearest abattoir)***

***Young calves/Bobby calves MUST be transported to the nearest possible abattoir***

The physiological detriment of transportation has been well documented in most farmed animals (Rutter and Randall, 1993). Travel-sick behaviour, including foaming at the mouth and teeth grinding, are often noted during transportation (Bradshaw, Hall et al., 1996), and one study determined that 33% of pigs vomited over a period of 1.5 hours in transit (Bradshaw, Parrott et al., 1996). It should be noted that this data may be under-representative, as many pigs will swallow vomit soon after cessation of movement (Bradshaw, Hall et al., 1996). To support this data, Forsling et al., (1984) showed that the experience of vibration and impact during travel caused elevated levels of plasma lysine vasopressin (LVP), a hormone associated with nausea and vomiting.

Stocking density is an underlying factor for many welfare concerns including the mitigation of extreme temperatures, social aggression and adequate room to display normal behaviour (Randall, 1993). Many authors have noted the occurrence of rectal prolapse when pigs are transported at high density; a condition highly indicative of extreme stress (Guise and Penny, 1989). Unfortunately there is little data available to correlate physiological responses to stocking density. However in the absence of such data, it should be assumed that there is a welfare cost involved, and animals should be allowed enough space to lie down simultaneously (Warriss, 1998).

Regulations should be put in place for maximum time travel – 8 hours, or to the nearest abattoir (should this be further than 8 hours).

Bobby calves MUST be transported to the nearest possible abattoir. This is paramount as welfare is a huge concern with such young animals that often receive inadequate colostrum and prolonged periods since last fed (even 24 hours, as stated in the new proposal, is long enough to result in dehydration and lethargy).

Bradshaw, R.H., and Hall, S.J.G. (1996). *Incidence of travel sickness in pigs.* *Veterinary Record*, 139, 503

Bradshaw, R.H., Parrott, R.F., Goode, J.A., Lloyd, D.M., Rodwar, R., and Broom, D.M. (1996). *Behavioural and hormonal responses of pigs during transport: Effect of mixing and duration of journey.* *Animal Science* 62, 547-554.

Forsling, M.L., Sharman, D.F., and Stephens, D.B. (1984). *Vasopressin in the blood plasma of pigs and calves exposed to noise and vibration comparable with that experienced during transport.* *Journal of Physiology* 357, 1057-1060.

Randall, J.M. (1993). *Environmental parameters necessary to define comfort for pigs, cattle and sheep in livestock transporters.* *Animal Production*, 57, 299-307.

Guise, H.J., and Penny, R.H. (1989). *Factors influencing the welfare and carcass and meat quality of pigs 1. The effects of stocking density in transport and the use of electric goads.* *Animal Production* 49, 511-515.

Warriss, P.D. (1998). *The welfare of slaughter pigs during transport*. *Animal Welfare* 7, 365-381.

Grandin, T. (1997). *Assessment of stress during handling and transport*. *Journal of Animal Science*, 75, 249-257.

## Re Proposal 29. Rodeos

### ***Rodeos must be prohibited***

Calf roping: 3-month old calves are chased at high speed, roped around the neck and thrown to the ground by a cowboy who ties its legs together. This can cause spinal damage, broken bones and internal haemorrhaging. These injuries can be fatal. The calf endures physical abuse and psychological stress.

Bucking: Animals buck because they are forced to wear a flank strap, which is tied tightly around their hindquarters, causing pain. The experience is painful, stressful, and terrifying.

Steer wrestling: A steer is chased in a rodeo arena, grabbed by the horns and twisted to the ground by a cowboy. This is an unnatural angle to twist their neck and can result in injury including a broken neck, broken horns and spinal injuries. Not to mention psychological stress.

While the literature in New Zealand rodeos is limited, it is undeniable that these animals endure physical abuse and psychological stress in the name of entertainment. Overseas research of the same cruel practices shows heightened cortisol (stress), and enzyme CK (muscle damage and trauma) due to this abhorrent "sport".

This cruel "sport" has already been banned in the UK, the Netherlands and parts of Australia, the United States and Canada. It is unacceptable that NZ still permits it.

To ban the use of fireworks is NOT good enough.

Corey, D. (2011). *Welfare issues in the rodeo horse*. Oxford, UK: Wiley-Blackwell.

## Re Proposal 13. Goats-Tethering requirements

### ***Prohibit the permanent tethering of goats***

MPI has stated that 50 complaints a year are made, relating to tethered goats. It is acknowledge that this is an area of frequent reoffending, and that current responses appear ineffective at deterring frequent reoffending.



The road-side, tethered goat is entirely restricted to seek out its own food, water and shelter, and even if these necessities are provided, the nature of tethering is such that the goat may tangle itself easily. As this is common practice in country farmland, any problems may go unnoticed for extended periods of time.

The practice of tethering a goat to the roadside is completely unnecessary, has no claim to a profit or benefit of any kind, and is heavily unjustified. The risks far outweigh any justification.

Furthermore, goats are highly social animals and are found in herds, the basic social unit being adult females and their recent offspring. Even males will form associations with other males or larger mixed-aged groups. Goats naturally range up to 13km a day, all the while in the company of other goats. This gives further reason to find the tethering of a single goat, alone on the road side, cruel and unjust.

I would strongly support a proposal to prohibit the tethering of goats, altogether.

#### **Re Proposal 27. Pigs-size of farrowing crates**

##### ***Progression of farrowing crates to farrowing pens***

Evidence suggests that sows in such confinement have weaker heart muscle and an increase in structural bone damage (Marchant et al., 1997), significantly higher levels of cortisol increasing with time spent in the crate ((Jarvis et al., 2001), and reduced milk production and growth rate (Brumm, 1996).

Welfare issues can be mitigated by allowing the sow a large enough area that she may turn around, a defecation area separate to the nesting area, and provision of nesting material (Weaver and Morris, 2004). I applaud you in already proposing a requirement of the latter.

I fully understand the benefits of farrowing crates (reduction of piglet mortality, separate piglet warming area, convenience etc), however this justification is now outdated as other options exist. I urge you to set a phase-out date for farrowing-crates, with compulsory progression to farrowing pens, which is larger than a crate, allowing more natural behaviours and mitigating the physical repercussions outlined above, while still offering protection for the piglets. These pens are already installed at Waikato's Warratah Farms, where Kirsty Chidgey carried out her research (The welfare, behaviour and productivity of sows and piglets in farrowing crates and farrowing pens).

Marchant, J.N., Rudd, A.R., and Broom, D.M. *The effects of housing on heart rate of gestating sows during specific behaviours. Applied Animal Behaviour Science* 55, 67-78.

Brumm, M.C. (1996). *Effect of space allowance on performance to 136 kilograms body weight. Journal of Animal Science* 74, 745-749.

Jarvis, S., Van der Vegt, B.J., Lawrence, A.B., McLean, K.A., Deans, L.A., Chirnside, J., and Calvert, S.K.

(2001). *The effect of parity and environmental restriction on behavioural and physiological responses of pre-parturient pigs. Applied Animal Behaviour Science* 71, 203-216.

Weaver, S.A., and Morris, M.C. (2004). *Science, pigs, and politics: a New Zealand perspective on the phase-out of sow stalls. Journal of Agricultural and Environmental Ethics* 17: 51-66.

#### **Re Proposal 67. Cattle and sheep- Castration and shortening of the scrotum**

#### **Proposal 70. Sheep-Tail docking**

***Administer long-acting pain relief at the time of the procedure***

***Prohibit the use of rings in lambs and cattle over 6 weeks old***

Studies have shown that out of the 3 methods of castration and docking (ring, surgical, or hot iron), ring castration elicits the most profound, chronic (longest-lasting) pain. So while applying a rubber ring is aesthetically pleasing and convenient for the farmer, the suffering is immense. We therefore have a moral obligation to mitigate this suffering, and approach this practice as meeting the criteria for a *significant surgical procedure*. It should be a requirement that a long-acting analgesic (such as NSAIDs) be administered at the time of the procedure.

Furthermore, at 6 months old the nervous system is well developed and the cut-off age for this practice should be much lower. The average age of tail docking and castration of lambs in NZ is at 3-6 weeks old anyway, and therefore should not cause a large inconvenience.

In cattle, not only is the nervous system well developed at this age, but the sheer size of the testicles means incomplete vascular occlusion is common, resulting in complications and a huge welfare concern. As a result of this practice, it is not uncommon in the veterinary profession to see steers with testicles swollen to the size of a football. This is unacceptable.

I therefore urge you to prohibit the use of rubber ring castration/docking in lambs and cattle over 6 weeks old.

Small, A. H., Belson, S., Holm, M., & Colditz, I. G. (2014). *Efficacy of a buccal meloxicam formulation for pain relief in Merino lambs undergoing knife castration and tail docking in a randomised field trial. Australian Veterinary Journal*, 92(10), 381-388. doi: 10.1111/avj.12241

## Re Proposals for Significant Surgical Procedures

### ***Long-acting pain relief given at the time of procedure***

A practice that meets the criteria for a *significant surgical procedure* should absolutely be required to give pain relief, not only at the time of the procedure, but also a longer-acting analgesic such as NSAIDs.

It could be assumed that procedures carried out by veterinarians would receive long-acting pain relief anyway, but this should be clearly stated. For those procedures permitted to be carried out by any person, it is crucial that this is clearly stated.

Examples of proposals that fall into this category include:

- 52. Embryo collection via exteriorised uterus
- 54. Liver Biopsy
- 57. Desexing
- 64. Cattle-claw removal
- 66. Cattle-tail docking
- 69. Cattle, sheep and goats- dehorning
- 72. Deer-Develveting
- 74. Horses-tail docking
- 78. Horses- castration
- 80. Pigs-castration

## Re proposal 25. Pigs-lying space for grower pigs + litter systems

***Min floor lying space of  $0.03 \times LW^{0.67}$  /pig ( $m^2$ ) for ALL group-housed pigs***  
***Mandatory forage material provided for all pigs***

The current proposal implies that if grower pigs are housed outdoor, or inside in a litter system, then this required floor space does not apply. This maximum stocking rate needs to be clearly applied to all pigs. Furthermore, litter systems should become compulsory.

**The negative effects of high stocking rates**, both psychological and physical stress to the animals, and in terms of decreased performance, have been identified in multiple studies.

Jones et al (2011) concluded that increased group size decreased average daily gain and Back Fat (both linear relationships). ie the higher stocking density the lower the ADG; an indication of stress – likely both social and physical (combating for nutrition).

Moinard et al (2003) reviewed stress risk factors for tail biting in grower pigs. The paper concluded that using a feeding system with five or more grower pigs per feed space increased risks of tail biting, as did a stocking density during the growing phase of 110 kg/m<sup>2</sup> or greater. The proposed floor area by MPI is already greater than this, so again, I simply urge you to extend the proposal to all group-housed pigs.



**Regarding litter-systems**, this same paper found that by adding straw to the area once or more per day decreased the risk of tail biting 10-fold. Ironically, Tail docking was also associated with a three-fold increase in the risk of tail biting.

Litter systems have been found to drastically reduce the incidence of both obsessive tail biting and aggressive social behaviour. For example, a comparative study was carried out between pigs housed in deep straw bedding and those confined to barren, slatted pens (Scott et al., 2006). The study found that 1.4% of pigs were removed for tail biting from the straw enclosures, while 11.7% were removed from the slatted pens.

The idea of environmental enrichment has also been supported by Beattie et al. (1995), who demonstrated that when provided with a rooting area and straw dispenser, pigs spent 0.02% of their time tail-biting, compared to 0.32% of their time when housed on bare, slatted floors.

In light of the abundant evidence, I urge you to apply the same maximum stocking rate to all group-housed pigs, as well as make litter-systems mandatory.

Jones, R. M., Crump, R. E., & Hermes, S. (2011). Group characteristics influence growth rate and backfat of commercially raised grower pigs. *Animal Production Science*, 51(3), 191-197.

Moinard, C., Mendl, M., Nicol, C. J., & Green, L. E. (2003). A case control study of on-farm risk factors for tail biting in pigs. *Applied Animal Behaviour Science*, 81(4), 333-355. doi: 10.1016/s0168-1591(02)00276-9

Scott, K., Chennells, D.J., Campbell, F.M., Hunt, B., Armstrong, D., Taylor, L., Gill, B.P., and Edwards, S.A. (2006). The welfare of finishing pigs in two contrasting housing systems: Fully slatted versus straw-bedded accommodation. *Livestock Science*, 103, 104-115.

Beattie, V.E., Walker, N. and Sneddon, I.A. (1995) Effects of environmental enrichment on behaviour and productivity of growing pigs. *Animal Welfare* 4, 207-220.

#### **Re proposals 17-19. Layer hens (38-40)**

##### ***Prohibit the use of cages in the poultry industry***

"Colony cages" are not fooling anyone. The stocking rates are still far too high, a wire floor, frustration, feather plucking, barbaric beak trimming- It's all still there. Get rid of them!! This intensive factory farming is appalling and a hideous side of NZ that the "clean green" image keeps hidden.

#### **Re Proposed regulations for the transport of live animals from NZ**

##### ***Live exports should be prohibited***

From: Sandy Jackson § 9(2)(a)  
 Sent: Thursday, 19 May 2016 9:11 a.m.  
 To: Animal Welfare Submissions  
 Subject: 'Submission on Animal Welfare Regulations'

## MPI Animal Welfare Codes Submission

**Nathan Guy**

**Minister for Primary Industries**

In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and I ask that a more realistic time frame be given for the public to have our say.

I suggest a period of five weeks be given to each section of the proposed welfare regulations.

While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, I ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare. I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

- 1) From 5.3m dairy cows in 2007 to 6.4m in 2012 (23% increase in just 5 years) Statistics NZ
- 2) Switzerland banned cages for hens in 1992

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on:</p> <ul style="list-style-type: none"> <li>a. the species and size of an animal</li> <li>b. the manner of use of an animal (circus)</li> <li>c. the location of the animal (slaughter premises)</li> </ul> <p>I support the proposed infringement penalty.</p>
2	All animals	Use of goads
		<p>I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.</p>
3	All animals	Twisting an animal's tail
		<p>I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.</p>

Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China



		<p>The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across Cook Strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.</p>
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed
		<p>I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to &lt;4 degrees Celsius renders crustacean insensible and propose that either:</p> <p>a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR</p> <p>b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to &lt;4 degrees Celsius renders crustacean insensible.</p> <p>I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.</p>
13	Goats	Tethering requirements
		<p>I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ.</p> <p>I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500.</p> <p>I also propose that as goats are social animals, all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300.</p> <p>1. Miranda-de la Lama, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10</p>
14	Horses	Use of a whip, lead, or any other object
		I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.
15	Horses	Injuries from equipment such as halter, head ropes and saddles

		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met. 1) Sections 9, 68 Animal Welfare Act 1999
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully<sup>1</sup>. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens<sup>2</sup>. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes<sup>3</sup>) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> <li>• Sufficient length of perching space to allow all birds to perch at the same time; and</li> <li>• Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night.</li> </ul> <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. 'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'<sup>4</sup>.</p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens<sup>4</sup>. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage  2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57.</p>

		<p>3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.</p> <p>4) Cooper, J.J. and Ablentosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>
20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		<p>Proposal: I support the proposal that all pigs have access to a dry sleeping area.</p> <p>Penalty: I support the proposed infringement penalty of \$300.</p>
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believe the formula intended by MPI should read "live weight<sup>0.67</sup> (kg)" but instead it reads "live weight 0.67(kg)" which translates to an Area = 0.03 * liveweight * 0.67(kg) and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. (2006) which ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI<sub>2</sub>. A k-value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen; not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage" 4. If these standards cannot be met by the current farming systems then we are concerned</p>



		<p>that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. I would like the regulations to be clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m<sup>2</sup>) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m<sup>2</sup>) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spooler, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. <a href="http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr">http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr</a> ibid. Page 9</p> <p>"ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 &lt;<a href="https://www.mpi.govt.nz/document-vault/1446">https://www.mpi.govt.nz/document-vault/1446</a>&gt;</p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC<sup>1</sup>. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates<sup>2,3</sup>.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>"National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 <a href="http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf">http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</a></p> <p>Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. <a href="http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042">http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</a></p> <p>KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. <a href="http://www.sciencedirect.com/science/article/pii/S0167587711003564">http://www.sciencedirect.com/science/article/pii/S0167587711003564</a></p>
28	Pigs	Provision of nesting material
		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting</p>



		<p>behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move. I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust.</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p> <p>Chaloupková, H. "The effect of nesting material on the nest-building and maternal ... - NCBI." 2011. <a href="http://www.ncbi.nlm.nih.gov/pubmed/20889685">http://www.ncbi.nlm.nih.gov/pubmed/20889685</a></p>
29	Rodeos	Fireworks
		<p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010) And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 62,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses
		<p>I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.</p>
31	Cattle	Milk stimulation
		<p>I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.</p>
32	Cattle and Sheep	Vehicular traction in calving or lambing
		<p>I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.</p>
33	Cattle and Sheep	Ingrown horns
		<p>I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.</p>
34	Stock transport	Cuts and abrasions

		I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.
35	Stock transport	Animals with ingrown horns
		I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.



Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities
		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p><a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		<p>I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading<sup>1</sup>. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p><a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a></p>
Proposed	Young Calves	Same day slaughter
		<p>I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p>
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves<sup>1</sup>. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>

44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.
45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age, therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper does not demonstrate that:</p> <ul style="list-style-type: none"> <li>this is in fact the case in calves &lt;5 days of age or</li> <li>that these calves are not experiencing significant hunger or</li> <li>that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study<sup>2</sup></li> </ul> <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves, we propose an increase in the infringement penalty to \$1000.</p> <p>Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.

50	Young Calves	Transport by sea across Cook Strait prohibited
		I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.
Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I purpose that all cats and dogs



		sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding
		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure 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 this procedure.
63	Cattle	Teats
		I support the proposal for supernumerary teat removal of animals >6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals <6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that: the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age i) infringement penalty of prosecution pain relief is required for any supernumerary teat removal procedure regardless of age ii) infringement penalty of prosecution procedure is performed using sterilised equipment iii) infringement penalty of \$500 any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian iv) infringement penalty of prosecution
64	Cattle	Claw removal
		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I

		propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.
65	Cattle	Teat occlusion
		I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking
		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking

		<p>I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking.</p> <p>Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months.</p> <p>I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male.</p> <p>I support the proposed penalty of prosecution for infringements in sheep &gt; 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use.</p> <p>I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep &lt; 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep &lt; 2 months of age and a penalty of \$300 for lack of NSAID use.</p>
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses
		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		<p>I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty.</p> <p>I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.</p>
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.



79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.
80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.

thank Sandra Jackson

s 9(2)(a)

Voter

**From:** Simon McDouall s 9(2)(a)  
**Sent:** Monday, 16 May 2016 7:58 p.m.  
**To:** Animal Welfare Submissions  
**Subject:** Animal Welfare Submission Support  
**Attachments:** MPI submission.docx

**Categories:** Green Category, Blue Category

Good Afternoon,

I'd like to put my support behind Ms Sarah Clew's submission regarding the MPI Proposed Animal Welfare Regulations. I believe she has researched important topics thoroughly and provided strong, reasoned arguments for her recommendations - all of which I strongly agree with.

I've attached a copy of Ms. Clew's submission.

I'll look forward to hearing about progress on these important issues.

Sincerely,

Simon G. McDouall

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

**Re Proposal 48. Young calves-Duration of transport + Lack of regulations around transportation for all livestock**

***Room to display normal behaviour and space to lie down simultaneously***

***Time restrictions for transport of all animals (8 hours or nearest abattoir)***

***Young calves/Bobby calves MUST be transported to the nearest possible abattoir***

The physiological detriment of transportation has been well documented in most farmed animals (Rutter and Randall, 1993). Travel-sick behaviour, including foaming at the mouth and teeth grinding, are often noted during transportation (Bradshaw, Hall et al., 1996), and one study determined that 33% of pigs vomited over a period of 1.5 hours in transit (Bradshaw, Parrott et al., 1996). It should be noted that this data may be under-representative, as many pigs will swallow vomit soon after cessation of movement (Bradshaw, Hall et al., 1996). To support this data, Forsling et al., (1984) showed that the experience of vibration and impact during travel caused elevated levels of plasma lysine vasopressin (LVP), a hormone associated with nausea and vomiting.

Stocking density is an underlying factor for many welfare concerns including the mitigation of extreme temperatures, social aggression and adequate room to display normal behaviour (Randall, 1993). Many authors have noted the occurrence of rectal prolapse when pigs are transported at high density; a condition highly indicative of extreme stress (Guise and Penny, 1989). Unfortunately there is little data available to correlate physiological responses to stocking density. However in the absence of such data, it should be assumed that there is a welfare cost involved, and animals should be allowed enough space to lie down simultaneously (Warriss, 1998).

Regulations should be put in place for maximum time travel – 8 hours, or to the nearest abattoir (should this be further than 8 hours).

Bobby calves MUST be transported to the nearest possible abattoir. This is paramount as welfare is a huge concern with such young animals that often receive inadequate colostrum and prolonged periods since last fed (even 24 hours, as stated in the new proposal, is long enough to result in dehydration and lethargy).

Bradshaw, R.H., and Hall, S.J.G. (1996). *Incidence of travel sickness in pigs. Veterinary Record*, 139, 503

Bradshaw, R.H., Parrott, R.F., Goode, J.A., Lloyd, D.M., Rodwar, R., and Broom, D.M. (1996). *Behavioural and hormonal responses of pigs during transport: Effect of mixing and duration of journey. Animal Science* 62, 547-554.

Forsling, M.L., Sharman, D.F., and Stephens, D.B. (1984). *Vasopressin in the blood plasma of pigs and calves exposed to noise and vibration comparable with that experienced during transport. Journal of Physiology* 357, 1057-1060.

Randall, J.M. (1993). *Environmental parameters necessary to define comfort for pigs, cattle and sheep in livestock transporters. Animal Production*, 57, 299-307.

Guise, H.J., and Penny, R.H. (1989). *Factors influencing the welfare and carcass and meat quality of pigs 1. The effects of stocking density in transport and the use of electric goads. Animal Production* 49, 511-515.



Warriss, P.D. (1998). *The welfare of slaughter pigs during transport*. *Animal Welfare* 7, 365-381.

Grandin, T. (1997). *Assessment of stress during handling and transport*. *Journal of Animal Science*, 75, 249-257.

## Re Proposal 29. Rodeos

### ***Rodeos must be prohibited***

Calf roping: 3-month old calves are chased at high speed, roped around the neck and thrown to the ground by a cowboy who ties its legs together. This can cause spinal damage, broken bones and internal haemorrhaging. These injuries can be fatal. The calf endures physical abuse and psychological stress.

Bucking: Animals buck because they are forced to wear a flank strap, which is tied tightly around their hindquarters, causing pain. The experience is painful, stressful, and terrifying.

Steer wrestling: A steer is chased in a rodeo arena, grabbed by the horns and twisted to the ground by a cowboy. This is an unnatural angle to twist their neck and can result in injury including a broken neck, broken horns and spinal injuries. Not to mention psychological stress.

While the literature in New Zealand rodeos is limited, it is undeniable that these animals endure physical abuse and psychological stress in the name of entertainment. Overseas research of the same cruel practices shows heightened cortisol (stress), and enzyme CK (muscle damage and trauma) due to this abhorrent "sport".

This cruel "sport" has already been banned in the UK, the Netherlands and parts of Australia, the United States and Canada. It is unacceptable that NZ still permits it.

To ban the use of fireworks is NOT good enough.

Corey, D. (2011). *Welfare issues in the rodeo horse*. Oxford, UK: Wiley-Blackwell.

## Re Proposal 13. Goats-Tethering requirements

### ***Prohibit the permanent tethering of goats***

MPI has stated that 50 complaints a year are made, relating to tethered goats. It is acknowledge that this is an area of frequent reoffending, and that current responses appear ineffective at deterring frequent reoffending.

The road-side, tethered goat is entirely restricted to seek out its own food, water and shelter, and even if these necessities are provided, the nature of tethering is such that the goat may tangle itself easily. As this is common practice in country farmland, any problems may go unnoticed for extended periods of time.

The practice of tethering a goat to the roadside is completely unnecessary, has no claim to a profit or benefit of any kind, and is heavily unjustified. The risks far outweigh any justification.

Furthermore, goats are highly social animals and are found in herds, the basic social unit being adult females and their recent offspring. Even males will form associations with other males or larger mixed-aged groups. Goats naturally range up to 13km a day, all the while in the company of other goats. This gives further reason to find the tethering of a single goat, alone on the road side, cruel and unjust.

I would strongly support a proposal to prohibit the tethering of goats, altogether.

#### **Re Proposal 27. Pigs-size of farrowing crates**

##### ***Progression of farrowing crates to farrowing pens***

Evidence suggests that sows in such confinement have weaker heart muscle and an increase in structural bone damage (Marchant et al., 1997), significantly higher levels of cortisol increasing with time spent in the crate ((Jarvis et al., 2001), and reduced milk production and growth rate (Brumm, 1996).

Welfare issues can be mitigated by allowing the sow a large enough area that she may turn around, a defecation area separate to the nesting area, and provision of nesting material (Weaver and Morris, 2004). I applaud you in already proposing a requirement of the latter.

I fully understand the benefits of farrowing crates (reduction of piglet mortality, separate piglet warming area, convenience etc), however this justification is now outdated as other options exist. I urge you to set a phase-out date for farrowing-crates, with compulsory progression to farrowing pens, which is larger than a crate, allowing more natural behaviours and mitigating the physical repercussions outlined above, while still offering protection for the piglets. These pens are already installed at Waikato's Warratah Farms, where Kirsty Chidgey carried out her research (The welfare, behaviour and productivity of sows and piglets in farrowing crates and farrowing pens).

*Marchant, J.N., Rudd, A.R., and Broom, D.M. The effects of housing on heart rate of gestating sows during specific behaviours. Applied Animal Behaviour Science 55, 67-78.*

*Brumm, M.C. (1996). Effect of space allowance on performance to 136 kilograms body weight. Journal of Animal Science 74, 745-749.*

Jarvis, S., Van der Vegt, B.J., Lawrence, A.B., McLean, K.A., Deans, L.A., Chirnside, J., and Calvert, S.K.

(2001). *The effect of parity and environmental restriction on behavioural and physiological responses of pre-parturient pigs. Applied Animal Behaviour Science* 71, 203-216.

Weaver, S.A., and Morris, M.C. (2004). *Science, pigs, and politics: a New Zealand perspective on the phase-out of sow stalls. Journal of Agricultural and Environmental Ethics* 17: 51-66.

**Re Proposal 67. Cattle and sheep- Castration and shortening of the scrotum**

**Proposal 70. Sheep-Tail docking**

***Administer long-acting pain relief at the time of the procedure***

***Prohibit the use of rings in lambs and cattle over 6 weeks old***

Studies have shown that out of the 3 methods of castration and docking (ring, surgical, or hot iron), ring castration elicits the most profound, chronic (longest-lasting) pain. So while applying a rubber ring is aesthetically pleasing and convenient for the farmer, the suffering is immense. We therefore have a moral obligation to mitigate this suffering, and approach this practice as meeting the criteria for a significant surgical procedure. It should be a requirement that a long-acting analgesic (such as NSAIDs) be administered at the time of the procedure.

Furthermore, at 6 months old the nervous system is well developed and the cut-off age for this practice should be much lower. The average age of tail docking and castration of lambs in NZ is at 3-6 weeks old anyway, and therefore should not cause a large inconvenience.

In cattle, not only is the nervous system well developed at this age, but the sheer size of the testicles means incomplete vascular occlusion is common, resulting in complications and a huge welfare concern. As a result of this practice, it is not uncommon in the veterinary profession to see steers with testicles swollen to the size of a football. This is unacceptable.

I therefore urge you to prohibit the use of rubber ring castration/docking in lambs and cattle over 6 weeks old.

Small, A. H., Belson, S., Holm, M., & Colditz, I. G. (2014). *Efficacy of a buccal meloxicam formulation for pain relief in Merino lambs undergoing knife castration and tail docking in a randomised field trial. Australian Veterinary Journal*, 92(10), 381-388. doi: 10.1111/avj.12241



## Re Proposals for Significant Surgical Procedures

### *Long-acting pain relief given at the time of procedure*

A practice that meets the criteria for a *significant surgical procedure* should absolutely be required to give pain relief, not only at the time of the procedure, but also a longer-acting analgesic such as NSAIDs.

It could be assumed that procedures carried out by veterinarians would receive long-acting pain relief anyway, but this should be clearly stated. For those procedures permitted to be carried out by any person, it is crucial that this is clearly stated.

Examples of proposals that fall into this category include:

- 52. Embryo collection via exteriorised uterus
- 54. Liver Biopsy
- 57. Desexing
- 64. Cattle-claw removal
- 66. Cattle-tail docking
- 69. Cattle, sheep and goats- dehorning
- 72. Deer-Develvetting
- 74. Horses-tail docking
- 78. Horses- castration
- 80. Pigs-castration

## Re proposal 25. Pigs-lying space for grower pigs + litter systems

### *Min floor lying space of $0.03 \times LW^{0.67}$ /pig (m<sup>2</sup>) for ALL group-housed pigs* *Mandatory forage material provided for all pigs*

The current proposal implies that if grower pigs are housed outdoor, or inside in a litter system, then this required floor space does not apply. This maximum stocking rate needs to be clearly applied to all pigs. Furthermore, litter systems should become compulsory.

**The negative effects of high stocking rates**, both psychological and physical stress to the animals, and in terms of decreased performance, have been identified in multiple studies.

Jones et al (2011) concluded that increased group size decreased average daily gain and Back Fat (both linear relationships). ie the higher stocking density the lower the ADG; an indication of stress – likely both social and physical (combating for nutrition).

Moinard et al (2003) reviewed stress risk factors for tail biting in grower pigs. The paper concluded that using a feeding system with five or more grower pigs per feed space increased risks of tail biting, as did a stocking density during the growing phase of 110 kg/m<sup>2</sup> or greater. The proposed floor area by MPI is already greater than this, so again, I simply urge you to extend the proposal to all group-housed pigs.

**Regarding litter-systems**, this same paper found that by adding straw to the area once or more per day decreased the risk of tail biting 10-fold. Ironically, Tail docking was also associated with a three-fold increase in the risk of tail biting.

Litter systems have been found to drastically reduce the incidence of both obsessive tail biting and aggressive social behaviour. For example, a comparative study was carried out between pigs housed in deep straw bedding and those confined to barren, slatted pens (Scott et al., 2006). The study found that 1.4% of pigs were removed for tail biting from the straw enclosures, while 11.7% were removed from the slatted pens.

The idea of environmental enrichment has also been supported by Beattie et al. (1995), who demonstrated that when provided with a rooting area and straw dispenser, pigs spent 0.02% of their time tail-biting, compared to 0.32% of their time when housed on bare, slatted floors.

In light of the abundant evidence, I urge you to apply the same maximum stocking rate to all group-housed pigs, as well as make litter-systems mandatory.

Jones, R. M., Crump, R. E., & Hermes, S. (2011). Group characteristics influence growth rate and backfat of commercially raised grower pigs. *Animal Production Science*, 51(3), 191-197.

Moinard, C., Mendl, M., Nicol, C. J., & Green, L. E. (2003). A case control study of on-farm risk factors for tail biting in pigs. *Applied Animal Behaviour Science*, 81(4), 333-355. doi: 10.1016/s0168-1591(02)00276-9

Scott, K., Chennells, D.J., Campbell, F.M., Hunt, B., Armstrong, D., Taylor, L., Gill, B.P., and Edwards, S.A. (2006). The welfare of finishing pigs in two contrasting housing systems: Fully slatted versus straw-bedded accommodation. *Livestock Science*, 103, 104-115.

Beattie, V.E., Walker, N. and Sneddon, I.A. (1995) Effects of environmental enrichment on behaviour and productivity of growing pigs. *Animal Welfare* 4, 207-220.

#### **Re proposals 17-19. Layer hens (38-40)**

##### ***Prohibit the use of cages in the poultry industry***

"Colony cages" are not fooling anyone. The stocking rates are still far too high, a wire floor, frustration, feather plucking, barbaric beak trimming- It's all still there. Get rid of them!! This intensive factory farming is appalling and a hideous side of NZ that the "clean green" image keeps hidden.

#### **Re Proposed regulations for the transport of live animals from NZ**

##### ***Live exports should be prohibited***

From: Rishi Adiga 9(2)(a)  
 Sent: Thursday, 19 May 2016 9:13 a.m.  
 To: Animal Welfare Submissions  
 Subject: Submission on Animal Welfare Regulations

## MPI Animal Welfare Codes Submission

**Nathan Guy**  
**Minister for Primary Industries**

In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and I ask that a more realistic time frame be given for the public to have our say.

I suggest a period of five weeks be given to each section of the proposed welfare regulations.

While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, I ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare. I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

1) 1) From 5.3m dairy cows in 2007 to 6.4m in 2012 (23% increase in just 5 years) Statistics NZ

2) 2) Switzerland banned cages for hens in 1992

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on:</p> <ul style="list-style-type: none"> <li>a. the species and size of an animal</li> <li>b. the manner of use of an animal (circus)</li> <li>c. the location of the animal (slaughter premises)</li> </ul> <p>I support the proposed infringement penalty.</p>
2	All animals	Use of goads
		<p>I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.</p>
3	All animals	Twisting an animal's tail
		<p>I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.</p>



Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.
7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China

		<p>The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across Cook Strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.</p>
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.
11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed
		<p>I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to &lt;4 degrees Celsius renders crustacean insensible and propose that either:</p> <p>a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR</p> <p>b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to &lt;4 degrees Celsius renders crustacean insensible.</p> <p>I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.</p>
13	Goats	Tethering requirements
		<p>I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ.</p> <p>I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500.</p> <p>I also propose that as goats are social animals, all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300.</p> <p>1. Miranda-de la Loma, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10</p>
14	Horses	Use of a whip, lead, or any other object
		I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.
15	Horses	Injuries from equipment such as halter, head ropes and saddles
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.



16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met. 1) Sections 9, 68 Animal Welfare Act 1999
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully<sup>1</sup>. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens<sup>2</sup>. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes<sup>3</sup>) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> <li>• Sufficient length of perching space to allow all birds to perch at the same time; and</li> <li>• Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night.</li> </ul> <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. 'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'<sup>4</sup>.</p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens<sup>4</sup>. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage  2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57.  3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.  4) Cooper, J.J. and Ablentosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>



20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		Proposal: I support the proposal that all pigs have access to a dry sleeping area. Penalty: I support the proposed infringement penalty of \$300.
25	Pigs	Lying space for grower pigs
		<p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believe the formula intended by MPI should read "live weight<sup>0.67</sup> (kg)" but instead it reads "live weight 0.67(kg)" which translates to an Area = 0.03 * liveweight * 0.67(kg) and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a k-value of 0.3 is too low. In 2006, Gonyou et al. (2006) which ADFI is reduced. More recently, a 2015 study has found that a k-value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI<sup>2</sup>. A k-value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen; not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide "sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage" <sup>4</sup>. If these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed. I would like the regulations to be</p>

		<p>clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (k-value of 0.047) was recommended best practice.</p> <p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m<sup>2</sup>) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m<sup>2</sup>) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>1) Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spooler, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>2) Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015. <a href="http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr">http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr</a></p> <p>3) ibid. Page 9</p> <p>4) "ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 &lt;<a href="https://www.mpi.govt.nz/document-vault/1446">https://www.mpi.govt.nz/document-vault/1446</a>&gt;</p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC<sup>1</sup>. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates<sup>2,3</sup>.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>1) "National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 <a href="http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf">http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</a></p> <p>2) Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. <a href="http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042">http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</a></p> <p>3) KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. <a href="http://www.sciencedirect.com/science/article/pii/S0167587711003564">http://www.sciencedirect.com/science/article/pii/S0167587711003564</a></p>
28	Pigs	Provision of nesting material
		<p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate. However, for</p>



		<p>clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust'</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p> <p>1) Chaloupková, H. "The effect of nesting material on the nest-building and maternal ... - NCBI." 2011. <a href="http://www.ncbi.nlm.nih.gov/pubmed/20889685">http://www.ncbi.nlm.nih.gov/pubmed/20889685</a></p>
29	Rodeos	Fireworks
		<p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010). And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 62,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p> <p>As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.</p>
30	Exotic animals	Used in circuses
		<p>I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.</p>
31	Cattle	Milk stimulation
		<p>I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.</p>
32	Cattle and Sheep	Vehicular traction in calving or lambing
		<p>I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.</p>
33	Cattle and Sheep	Ingrown horns
		<p>I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.</p>
34	Stock transport	Cuts and abrasions
		<p>I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.</p>
35	Stock transport	Animals with ingrown horns



		I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities

		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		<p>I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading<sup>1</sup>. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a></p>
Proposed	Young Calves	Same day slaughter
		I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves<sup>1</sup>. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.

45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age; therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics
		I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper<sup>1</sup> does not demonstrate that:</p> <ul style="list-style-type: none"> <li>a) this is in fact the case in calves &lt;5 days of age or</li> <li>b) that these calves are not experiencing significant hunger or</li> <li>c) that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study<sup>2</sup></li> </ul> <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>1) Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>2) Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves we propose an increase in the infringement penalty to \$1000.</p> <p>1) Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.
50	Young Calves	Transport by sea across Cook Strait prohibited
		I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.



Surgical and painful procedures regulatory proposals		
51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I propose that all cats and dogs sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding

		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking
		I support the docking of tails in dogs for therapeutic reasons only. The procedure 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 this procedure.
63	Cattle	Teats
		<p>I support the proposal for supernumerary teat removal of animals &gt;6 weeks of age to be performed by a veterinarian or veterinary student and that pain relief must be used. I does not support the removal of supernumerary teats in animals &lt;6 weeks of age without pain relief, however the procedure could be undertaken by a skilled lay person signed off by a veterinarian (ie a vet tech). I propose that:</p> <ul style="list-style-type: none"> <li>a) the maximum of age of animals on whom supernumerary teat removal can be performed by a lay person is reduced to 4 weeks of age <ul style="list-style-type: none"> <li>i) infringement penalty of prosecution</li> </ul> </li> <li>b) pain relief is required for any supernumerary teat removal procedure regardless of age <ul style="list-style-type: none"> <li>ii) infringement penalty of prosecution</li> </ul> </li> <li>c) procedure is performed using sterilised equipment <ul style="list-style-type: none"> <li>iii) infringement penalty of \$500</li> </ul> </li> <li>d) any person performing the procedure who is not a veterinarian or directly supervised veterinary student is signed off by a veterinarian <ul style="list-style-type: none"> <li>iv) infringement penalty of prosecution</li> </ul> </li> </ul>
64	Cattle	Claw removal
		I support the proposal that claw removal is restricted to being performed by a veterinarian or veterinary student and that pain relief is required at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional non-steroidal anti-inflammatory drug (NSAID) pain relief is also administered. I support the infringement penalty of prosecution for all offences other than not using NSAID for which the infringement penalty should be \$300.

65	Cattle	Teat occlusion
		I support the proposal that teat sealing can only be performed with a product registered for that specific purpose. I support the infringement penalty of prosecution.
66	Cattle	Tail docking
		I support the restriction of tail docking to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons only, and the use of pain relief at the time of the procedure. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also administered. I support the proposed penalty of a prosecutable offence for all offences other than not using NSAID for which the infringement penalty should be \$300.
67	Cattle and sheep	Castration and shortening of the scrotum (cryptorchid)
		I support the proposal for surgical castration at any age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I support the proposal that non-surgical castration in cattle and sheep over 6 months of age to be limited to veterinarians and directly supervised veterinary students and that pain relief must be used. I does not support the age of 6 months as an appropriate age at which lay people can no longer perform non-surgical castration and propose that this age limit is lowered to 2 months, I support limiting the manner of non-surgical castration to only the use of conventional rubber rings. I does not support performing non-surgical castration without pain relief at any age and propose that pain relief is required for any castration procedure at any age. I propose that in addition to the pain relief at the time of the procedure additional NSAID pain relief is also required. I propose that the penalty for all infringements other than lack of NSAID use is prosecution and that the penalty for not using an NSAID is an infringement of \$300.
68	Cattle, sheep and goats	Disbudding
		I propose that disbudding is limited to being performed only by only a veterinarian, veterinary student under direct supervision, or skilled lay person signed off by a veterinarian (ie vet tech/appropriately trained farm worker). I propose that appropriate maximum ages are determined for disbudding to be performed by a lay person. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
69	Cattle, sheep and goats	Dehorning
		I propose that disbudding is limited to being performed only by only a veterinarian or veterinary student under direct supervision. Given the much greater risk of pain, bleeding, and infection from dehorning rather than disbudding I propose that farmers are given 12 months warning after which dehorning can only be performed by veterinarians. This will give a strong message that disbudding is much preferred and much more economically viable. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support the proposed penalty of prosecution for lack of use of pain relief and propose an infringement penalty of \$300 for lack of NSAID use.
70	Sheep	Tail docking
		I support the limiting of tail docking in sheep who are greater than 6 months of age to veterinarians and directly supervised veterinary students. I support the use of pain relief during the procedure and propose that additional NSAID pain relief is also administered. I support restricting the techniques for tail docking in younger animals to rubber ring and hot iron only. I propose that pain relief at the time of procedure and NSAID should also be required, regardless of age at the time of tail docking.



		<p>Furthermore I propose that the maximum age at which a lay person is able to perform a tail docking procedure is reduced to 2 months.</p> <p>I support the proposal that tails are not to be cut flush and are to be able to cover the vulva in a female and of a similar length in a male.</p> <p>I support the proposed penalty of prosecution for infringements in sheep &gt; 2 months of age and propose an infringement penalty of \$300 for lack of NSAID use.</p> <p>I support the proposed penalties of \$500 for use of non-listed methods and not cutting tails flush in sheep &lt; 2 months of age. I propose a penalty of prosecution for not using pain relief in sheep &lt; 2 months of age and a penalty of \$300 for lack of NSAID use.</p>
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develveting
		I support the proposal for develveting to be only performed by veterinarians, directly supervised veterinary students or a person with veterinary approval. I support the proposed infringement penalty.
73	Horses	Blistering, firing, or nicking
		I support the proposal to prohibit blistering, firing or nicking, and support the proposed infringement penalty.
74	Horses	Tail docking
		I support the proposal for tail docking to only be performed by veterinarians or directly supervised veterinary students, only for therapeutic reasons, only with the use of pain relief. I support the proposed infringement penalty.
75	Horses	Rectal pregnancy diagnosis of horses
		I support the proposal for rectal pregnancy diagnosis in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
76	Horses	Rectal examination of horses
		I support the proposal for rectal examination in horses to be performed only by a veterinarian or directly supervised veterinary student. I support the proposed infringement penalty.
77	Horses	Caslick's procedure
		<p>I support the proposal for creation, opening and repair of caslick's procedure to only be performed by a veterinarian or directly supervised veterinary student and the use of pain relief for the procedure. I support the proposed infringement penalty.</p> <p>I propose that a caslick's procedure may only be performed for therapeutic purposes and not for a perceived performance benefit and that the proposed infringement penalty for this breach is the same as that proposed above.</p>
78	Horses	Castration
		I support the proposal for castration in horses to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the time of the procedure. I support the proposed infringement penalty.
79	Llama and alpaca	Castration
		I support the proposal for castration in llama and alpaca to be performed only by a veterinarian or directly supervised veterinary student and for the use of pain relief at the

		time of the procedure, and the minimum age for the procedure. I support the proposed infringement penalties for these infringements.
80	Pigs	Castration
		I support the proposal for castration to only be performed by a veterinarian or veterinary student under direct supervision and the required use of pain relief at the time of the procedure. I support the infringement penalty of prosecution. I propose that a non-steroidal anti-inflammatory drug (NSAID) is also required and that the penalty for not administering an NSAID is \$300.
81	Pigs	Tail docking
		I propose that pain relief should be used for this procedure regardless of the animal's age. I support limiting the procedure to veterinarians and directly supervised veterinary students in animals > 7 days of age. I propose that a NSAID should also be administered at the time of the procedure. I propose an infringement penalty of prosecution for lack of use of pain relief and for a lay person performing the procedure in an animal > 7 days of age. I propose an infringement penalty of \$300 for lack of NSAID administration.
82	Birds	Pinioning or otherwise deflighting a bird
		I support the restriction of pinioning/deflighting a bird to being performed only by a veterinarian or directly supervised veterinary student, only being performed in the best interests of the animal, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
83	Poultry	Dubbing
		I support the proposed penalty of a prosecutable offence to perform dubbing on breeds not usually dubbed and to not use pain relief at the time of the procedure. I oppose the surgical modification of an animal if the modification is not in the interests of the animal, therefore I propose that dubbing is prohibited with the penalty of a prosecutable offence.
84	Ostriches and emus	Declawing
		I support the prohibition of radical declawing of emu chicks. However the use of the term radical implies that some declawing is allowed and opens the regulation to subjective interpretation. I propose that the regulation prohibit all declawing of emu or ostrich unless performed by a vet for therapeutic reasons. I support the penalty of prosecutable offence.
85	Roosters	Caponising (rooster castration)
		I support the restriction of caponising to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.

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William Worsfold

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## MPI Animal Welfare Codes Submission

Nathan Guy

### Minister for Primary Industries

In response to MPI's request for feedback on proposed animal welfare regulations I submit the following for your careful consideration.

The given consultation period (14th April to 10 May 2016) for public involvement is woefully inadequate. Five weeks is unrealistic and makes a mockery of the consultation process. The volume of proposals we are being asked to consider in this time frame isn't feasible and I ask that a more realistic time frame be given for the public to have our say.

I suggest a period of five weeks be given to each section of the proposed welfare regulations.

While the proposed regulations relating to live animal exports, the care and conduct towards animals, and surgical and painful procedures is a start, I ask that there be a full review into intensive farming practices across the agricultural industry.

The last two decades have seen the intensification of animal agriculture to levels that are unprecedented in recent history. The current welfare codes and proposed welfare regulations don't go nearly far enough in protecting animal welfare under increasingly intensive farming practices.

Society's moral values are constantly shifting yet these regulations have remained largely static and are vastly out of step with changing attitudes to animal welfare. I want to see a total ban on all cages for layer hens, farrowing crates for sows and a reduction in intensive dairy resulting in the slaughter of over 2m calves annually.

These farming practices can no longer be deemed humane by today's standards and cannot be incorporated as such in any welfare code. The new rules are not keeping pace with changing scientific knowledge and cannot be accepted as good practice.

- 1) From 5.3m dairy cows in 2007 to 6.4m in 2012 (23% increase in just 5 years) Statistics NZ
- 2) Switzerland banned cages for hens in 1992

Care and conduct regulatory proposals		
1	All animals	Electric prodders
		<p>I propose that the use of electric prodders be banned under all circumstances except when they are "necessary for protection, preservation or maintenance of human life"</p> <p>I do not support exemptions on the use of prodders based on:</p> <ol style="list-style-type: none"><li>a. the species and size of an animal</li><li>b. the manner of use of an animal (circus)</li><li>c. the location of the animal (slaughter premises)</li></ol> <p>I support the proposed infringement penalty.</p>



2	All animals	Use of goads
		I support the proposal to ban the use of goads on sensitive areas of an animal's body under any circumstances. Given the deliberate cruelty involved in using goads on sensitive areas I propose an increased infringement penalty of \$500.
3	All animals	Twisting an animal's tail
		I support the proposal to prohibit painful twisting of an animal's tail. Given the potential for significant pain and damage from this behaviour, and the deliberate nature of the act I propose the infringement penalty is set at the higher level of \$500.
Proposed	All animals	Any animal requiring manual lifting must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick animals).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading<sup>1</sup>, only one individual was prosecuted in relation to the footage<sup>2</sup>, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p>1) <a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a>  2) <a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
4	Dogs	Pinch and Prong collars
		I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes (guarding, military) is supported. I support the proposed infringement penalty of \$300. I also support the banning of the sale of these collars and associated penalties under the law.
5	Dogs	Injuries from collars or tethers
		I support the proposal to only use collars or tethers in a manner that does not result in injury or distress. Given the potential for severe injury from collars I propose the penalty is increased to a prosecutable offence.
6	Dogs	Muzzling a dog
		I support the proposal for regulating the use of muzzles so they do not cause injury or distress. I support the inclusion in the proposal that muzzles should allow for a dog to be able to drink. I support the proposed infringement penalty of \$300.

7	Dogs	Dry and shaded shelter
		I support the proposal for dogs to have access to dry and shaded shelter at all times. I propose the inclusion in the proposal that dogs also have access to fresh, palatable drinking water at all times. Given that shelter and water are basic needs of life neglecting these items has the potential to cause significant harm and even death therefore I propose the infringement penalty to be increased to a prosecutable offence. I also propose that there be a maximum time imposed that a dog is allowed to be chained for at any one time and that an infringement fee be set for exceeding that time.
8	Dogs	Dogs left in vehicles
		I support the proposal for people leaving dogs in vehicles to ensure their safety. I propose increasing the penalty to a prosecutable offence both to reflect the potential fatal nature of the injury and also to act as a suitable penalty to prevent this behaviour. Additionally increasing the penalty allows for effective prosecution of corporations who use dogs who have a responsibility to ensure dogs in their care are cared for appropriately.
9	Dogs	Secured on moving vehicles
		I support the proposal to secure dogs on moving vehicles. I propose including dogs on vehicles on private property in the regulation, and propose a speed limit of 40kph for vehicles carrying unsecured working dogs. I propose increasing the penalty for infringement to \$1000 due to the potential for severe injury, suffering, and death resulting from falling from a moving vehicle.
Proposed	Dogs	Ban export of racing greyhounds between NZ and Macau or China
		The Macau and China greyhound racing industries do not have the same standards of animal welfare as NZ. The export of racing greyhounds between NZ and Hong Kong (for further transport to Macau/China) is minimal at present. However if the export of greyhounds from other countries (Australia, Ireland) is banned or more heavily regulated then NZ could become a transport hub for dogs in this industry. This has the potential for poor welfare outcomes for dogs and very poor public perception in New Zealand. It is far better to ban an activity like this before it has the potential to become established. MPI have demonstrated their willingness to put in place infringements for uncommon industry activities which have the potential to become welfare issues in the future with proposal 50 in this document banning transport of young calves across Cook Strait. I propose the above regulation and propose the infringement penalty is set at a prosecutable offence.
10	Dogs and Cats	Drowning dogs and cats
		I support the prohibition of the killing of a dog or cat of any age by drowning. I support the infringement penalty of a prosecutable offence.

11	Eels	Insensible for desliming
		I support the proposal that eels must be insensible for desliming or killed before they are deslimed. I support the infringement penalty of a prosecutable offence.
12	Crabs, rock lobster and crayfish	Insensible before being killed
		<p>I support the proposal that crabs, rock lobster, and crayfish must be insensible before they are killed. I dispute the NAWAC statement that chilling to &lt;4 degrees Celsius renders crustacean insensible and propose that either:</p> <p>a. the only legally acceptable method of rendering crabs and crayfish insensible is by electrical stunning (for which specific equipment is available for use in small restaurant premises). OR</p> <p>b. NAWAC conduct a review of the recent (since 2000) scientific literature on humane slaughter of crustaceans and present good quality, recent evidence to support the claim that chilling to &lt;4 degrees Celsius renders crustacean insensible.</p> <p>I support the proposed penalty of a prosecutable offence for failing to render a crustacean insensible prior to slaughter.</p>
13	Goats	Tethering requirements
		<p>I do not support the tethering of goats, on the basis that it stops goats expressing normal social behaviours, and propose that tethering is prohibited with an infringement penalty of \$500. Furthermore I share concerns with previous submissions around tethering of goats that tourists witnessing tethered goats on the road side could easily get a negative impression of animal welfare in NZ.</p> <p>I propose that all goats, regardless of housing system, have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times and that lack of provision of these requirements is an infringement with a penalty fee of \$500.</p> <p>I also propose that as goats are social animals, all goats should be provided with a companion such as another goat, camelid, horse, donkey or sheep. I propose that failure to house a goat with a companion should attract an infringement penalty of \$300.</p> <p>1. Miranda-de la Lama, G.C. and Mattiello, S. (2010). The importance of social behaviour for goat welfare in livestock farming. Small Ruminant Research 90, (1-3), 1-10</p>
14	Horses	Use of a whip, lead, or any other object
		I support the prohibition of using a whip, lead or other object to strike around the head. I support the proposed infringement penalty of \$300.



15	Horses	Injuries from equipment such as halter, head ropes and saddles
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
16	Horses and Donkeys	Tethering requirements
		I do not support the tethering of horses and donkeys and propose that tethering is prohibited with an infringement penalty of \$300. I propose that all horses and donkeys have access to a dry and shaded shelter, appropriate food, and fresh palatable water at all times regardless of housing system and that lack of provision of these requirements is an infringement with a penalty fee of \$300.
17	Layer Hens	Opportunity to express normal behaviours in housing systems
		<p>I believe that colony cages do not adequately consider the welfare of layer hens because they prohibit the ability of the hen to express a range of normal behaviours. In addition, colony cages are not compliant with the Animal Welfare Act 1999 as they do not allow owners or persons in charge of animals to take all reasonable steps to ensure that their physical, health and behavioural needs are met.</p> <p>1) Sections 9, 68 Animal Welfare Act 1999</p>
18	Layer Hens	Stocking densities
		Colony cages do not allow hens to engage in a range of normal behaviours and therefore they are in clear breach of the Animal Welfare Act 1999. With a stocking density of 13 hens per square metre or 750 square centimetres, clearly the stocking density is too high.
19	Layer Hens	Housing and equipment design
		<p>Colony cages are only slightly bigger than traditional battery cages. While they provide token welfare gestures like nest boxes, scratch pads and perches, these gestures do not ensure the physical, health and behavioural needs of hens are met. With only 750 sq cm per hen, there are a number of behaviours hens are not able to functionally perform in colony cages; this includes spreading her wings fully. It's also questionable whether a hen in a colony cage can properly nest, perch, peck or scratch. A hen in a colony cage cannot dust bathe.</p> <p>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens<sup>2</sup>. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes) if they want to lay at the same time.</p> <p>In order to satisfy a hen's need for perching, the housing system must be able to provide:</p> <ul style="list-style-type: none"> <li>• Sufficient length of perching space to allow all birds to perch at the same</li> </ul>

		<p>time; and</p> <ul style="list-style-type: none"> <li>Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night.</li> </ul> <p>Colony cages fulfil neither of these requirements. The standard of approximately 15cm of space per hen is an average and does not allow consideration for larger birds. Perches in colony systems are situated on average just a few centimetres from the floor of the cage. <i>'A perch positioned 5cm above floor level is 'not considered as a perch (by a hen) and has no attractive or repulsive value'.</i></p> <p>Litter is not provided in colony cage systems. Litter is imperative for hen welfare. Hens will make great efforts to access litter for pecking, scratching and dustbathing – three normal behaviours of hens. When hens are unable to forage in litter, they can redirect their pecking towards other hens resulting in harmful feather pecking and even cannibalism. When hens are unable to dustbathe in litter, they can develop the dysfunctional behaviour of sham dustbathing.</p> <p>1) A hen's wingspan is approximately 75-80 centimetres which is twice the size of a traditional battery cage</p> <p>2) Guedson, V. and Faure, J. M. (2004) <i>Laying performance and egg quality in hens kept in standard or furnished cages</i>. Animal Research, 53: 45-57.</p> <p>3) Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.</p> <p>4) Cooper, J.J. and Ablettosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.</p>
20	Layer Hens	Induced moulting
		I support the proposal to prohibit induced moulting of layer hens.
21	Llama and Alpaca	Injuries from equipment such as halters, head ropes, and packs
		I support the proposal to ensure that equipment is used in a manner that does not result in injury or distress. I support the proposed infringement penalty of \$300.
22	Llama and Alpaca	Companion animals
		I support the proposal that camelids must be provided with a companion animal. I support the proposed infringement penalty of \$300.
23	Llama and Alpaca	Offspring (Cria) camelid companions
		I support the proposal to prohibit raising Cria without the company of other camelids. I support the proposed infringement penalty of \$500.
24	Pigs	Dry sleeping area
		Proposal: I support the proposal that all pigs have access to a

		<p>dry sleeping area.</p> <p>Penalty: I support the proposed infringement penalty of \$300.</p>
25	Pigs	<p>Lying space for grower pigs</p> <p>Proposal: I support the proposal for minimum space requirements for grower pigs.</p> <p>1. Error in formula</p> <p>The proposed formula used to calculate the minimum space has a type error; specifically the exponent notation has not been applied. I believes the formula intended by MPI should read “live weight<sup>0.67</sup> (kg)” but instead it reads “live weight 0.67(kg)” which translates to an Area = 0.03 * liveweight * 0.67(kg) and results in a much higher space requirement.</p> <p>Therefore I contend that proposal 25 must be rewritten and resubmitted for public consultation, with the correct formula included so that the intended space requirement can be properly considered.</p> <p>2. Minimum requirement</p> <p>Recent research suggests that a <math>k</math> value of 0.3 is too low. In 2006, Gonyou et al. (2006), which ADFI is reduced. More recently, a 2015 study has found that a <math>k</math> value of 0.0336 might underestimate the impact of increased stocking density on ADG and ADFI.</p> <p>A <math>k</math> value of 0.3 is too low to provide grower pigs with this environment and is sufficient as a minimum requirement for static space only.</p> <p>Does the proposal adequately define the appropriate systems?</p> <p>The proposal is based on a minimum standard, which is expected to occur (if at all) only where growers have reached the capacity of their pen and are shortly to be moved to a bigger pen; not a minimum standard which is considered acceptable at all times and this should be clarified in the regulation itself.</p> <p>I consider the minimum standards of housing for pigs to be provide “sufficient space to enable them to perform natural behaviours such as lying on their side without touching another pig, standing up, turning around and performing exercise, space for separate areas for dunging and feeding, with a dunging areas situated a sufficient distance from sleeping and feeding areas as well as materials to enable them to root and forage” 4. If these standards cannot be met by the current farming systems then we are concerned that the current farming systems are not compatible with the freedom to exhibit normal behaviour and breach the animal welfare act.</p> <p>The current regulation has no limit on the length of time during which a grower pig may be submitted to the proposed minimum standard. Overstocking is a known problem. I am concerned that grower pigs may be submitted to spaces which do not meet minimum requirement if their transfer to a new pen is delayed.</p> <p>I would like the regulations to be clear that it is unacceptable for growers to be kept for prolonged periods in spaces at or close to the minimum requirement. In its 2010 review, NAWAC submitted that space enough to allow for pigs to lie fully recumbent (<math>k</math> value of 0.047) was recommended best practice.</p>



		<p>For the sake of clarity and to give effect to the intention of NAWAC, I suggest that a minimum period of time for growers kept in the lower end of the scale be added.</p> <p>Due to the above considerations, I propose that the minimum standard is amended to:</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m<sup>2</sup>) per pig = 0.040 x live weight 0.67(kg)</p> <p>Grower pigs housed inside on non-litter systems such as slatted or solid floors must not have lying space of less than: Area (m<sup>2</sup>) per pig = 0.047 x live weight 0.67(kg) for longer than one week.</p> <p>Penalty: I support penalty of a prosecutable regulation offence.</p> <p>Gonyou, H. W., M. C. Brumm, E. Bush, J. Deen, S. A. Edwards, T. Fangman, J. J. McGlone, M. Meunier-Salaun, R. B. Morrison, H. Spoolder, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken-line analysis to assess floor space requirements of nursery and grower-finisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229-235.</p> <p>Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015.</p> <p><a href="http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr">http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&amp;context=kaesrr</a></p> <p>ibid. Page 9</p> <p>"ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 &lt;<a href="https://www.mpi.govt.nz/document/vault/1446">https://www.mpi.govt.nz/document/vault/1446</a>&gt;</p>
26	Pigs	Dry sow stalls
		<p>Proposal: I support the prohibition of dry sow stalls</p> <p>Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.</p>
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates.</p> <p>Production systems using farrowing crates are not the only financially viable forms of pork production. It is widely accepted that sow welfare in farrowing crates is sub-optimal. Continuing a production system which is contrary to good practice and scientific knowledge is in direct violation of section 10 of the Animal Welfare Act 1999.</p> <p>In 2016, a review of Farrowing Crates for Pigs in NZ was submitted by NAWAC. In that report, NAWAC stated that "no significant change in science, technology or good practice from 2010 when the pigs code of welfare was issued". It submitted that the levels of piglet mortality in farrowing pens is higher than in farrowing crates and used this as justification for retaining farrowing crates in New Zealand. However, there is abundant research which supports the conclusion that total piglet mortality on farms with loose farrowing systems does not differ from that of farms with crates<sup>2,3</sup>.</p>

		<p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <p>"National Animal Welfare Advisory Committee □ NZPork." 2016. 15 May. 2016  <a href="http://www.nzpork.co.nz/images/custom/farrowing_crate_advice_14_march_2016.pdf">http://www.nzpork.co.nz/images/custom/farrowing_crate_advice_14_march_2016.pdf</a></p> <p>Weber, R. "Piglet mortality on farms using farrowing systems ... □ IngentaConnect." 2007.  <a href="http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042">http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</a></p> <p>KilBride, AL. "A cohort study of preweaning piglet mortality and ... □ ScienceDirect." 2012.  <a href="http://www.sciencedirect.com/science/article/pii/S0167587711003564">http://www.sciencedirect.com/science/article/pii/S0167587711003564</a></p>
28	Pigs	<p>Provision of nesting material</p> <p>Proposal: I support the provision of nesting material that can be manipulated to sows. However, it is clear that sows in farrowing crates will be unable to exhibit natural nesting behaviours in the confined space of a farrowing crate. To give effect to the intention of providing nesting material, the sow must be given more space in which to move.</p> <p>I agree that the definition of manipulable material should be made more apparent. "Material at ground level which mimics that of natural nesting material and encourages the sow to exhibit rooting behaviour" would be appropriate.</p> <p>However, for clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust.</p> <p>Penalty: I support the proposed infringement penalty of prosecution.</p> <p>Chaloupková, H. "The effect of nesting material on the nest □ building and maternal ... □ NCBI." 2011. <a href="http://www.ncbi.nlm.nih.gov/pubmed/20889685">http://www.ncbi.nlm.nih.gov/pubmed/20889685</a></p>
29	Rodeos	<p>Fireworks</p> <p>I support the ban of fireworks at rodeo's, The loud noise of fireworks is well established as a stressor in companion animals (Bolster 2012; Dale et al., 2010) And Unexpected noise and movement will cause the fight or flight response in both horses and cattle (Lanier, 2000; Christensen, 2005).</p> <p>I would like to see a total ban on rodeo, rodeo is of no advantage to the economy. A petition recently submitted to parliament has 62,000 members of the public in support of such a ban. Rodeo is in breach of the animal welfare act which states that animals should be 'physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.' The rodeo is a form of entertainment therefore making it an unnecessary activity for animals to be involved in. The likelihood of animals feeling distress while performing in rodeos could only be successfully minimised if rodeos were entirely stopped; goading animals into states of distress is fundamental to getting them to perform in rodeo events.</p>

		As there have been many breaches of the rodeo code brought before MPI in 2014 and 2015 we strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. We are aware of new breaches that will be brought before MPI for a third year running, this adds to the evidence that these codes are not adequate for protecting animals, therefore we feel that the only way to ensure these breaches do not continue is for an outright ban.
30	Exotic animals	Used in circuses
		I do not support the use of exotic animals in circuses and propose that their use be banned. Given that there are currently no circuses in NZ using exotic animals the banning of the practice now will cause no industry disruption. Popular opinion both here and overseas is moving away from the use of exotic animals in circus and if this practice was to occur again in NZ it is likely that there would be a public outcry against it.
31	Cattle	Milk stimulation
		I support the proposal to prohibit the stimulation of milk let down by inserting water or air into a cow's vagina. I propose the prohibition is extended to include the insertion of any object into a cow's vagina to stimulate milk let down. I support the proposed infringement penalty of \$300.
32	Cattle and Sheep	Vehicular traction in calving or lambing
		I support the proposal to prohibit the use of a moving vehicle to provide traction in lambing or calving. I support the proposed infringement penalty of \$500.
33	Cattle and Sheep	Ingrown horns
		I support the proposal to require treatment for horns that are touching the skin or eye. I support the proposed infringement penalty of \$500.
34	Stock transport	Cuts and abrasions
		I support the proposal that transport should not result in cuts or abrasions. I propose the regulation is extended to all animals' not just cattle, sheep, deer, goats, and pigs. I support the infringement penalty of \$500.
35	Stock transport	Animals with ingrown horns
		I support the proposal that animals with ingrown horns must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.



36	Stock transport	Animals with bleeding horns or antlers
		I support the proposal that animals with bleeding horns or antler must not be transported unless certified fit for transport by a veterinarian. I support the proposed infringement penalty of \$500.
37	Stock transport	Animals with long horns or antlers
		I support the proposal that animals with long horn or antler must not cause injury to themselves or others during transport. I could not find any rationale for the use of 110mm as a cut off value for long antler either in the code of welfare, or the report on the code. I propose that MPI publish the rationale behind the cut off value of 110mm or perform analysis of the injuries sustained from transport of animals with horns to determine if this measurement is an appropriate guide. I support the proposed infringement penalty of \$500.
38	Stock transport	Lame cattle, deer, pigs and goats
		I support the proposal that cattle, sheep, pigs and goats with lameness scores of 2 must be certified for transport by a veterinarian and that animals with a lameness score of 3 must not be transported. I support the proposed infringement penalty of \$500.
39	Stock transport	Animals that cannot bear weight evenly due to injury
		I support the proposal that animals who cannot bear weight evenly due to injury require certification from a veterinarian for transport. I support the infringement penalty of \$500.
40	Stock transport	Pregnant animals
		I support the proposal that animals who are in late stages of pregnancy should not be transported. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
41	Stock transport	Animals with injured or diseased udders
		I support the proposal that animals who have diseased udders should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.

42	Stock transport	Cattle or sheep with cancer eye
		I support the proposal that animals who have cancer eye which is large, not confined to the eyelid or discharging/bleeding should not be transported, unless certified by a veterinarian. I propose extending the time frame to not likely to give birth within 48 hours of arrival at slaughter premises. I support the infringement penalty of \$500.
Young calf management regulatory proposals		
43	Young Calves	Loading and unloading facilities
		I support the proposal that facilities must be provided which enable young calves to walk onto and off transportation by their own action. Given the potential for severe injury and pain I propose that the infringement penalty is increased to \$1000.
Proposed	Young Calves	Calves must not be thrown, if they need to be manually lifted they must be placed on the ground so they are able to balance on all four feet or sit in sternal recumbency (or lateral recumbency for sick calves).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading, only one individual was prosecuted in relation to the footage, presumably relating to the more severe actions at the slaughterhouse rather than those of the workers loading the trucks. There is clearly a need for simple, easily enforceable, law around wilful mishandling of animals which is not provided for in the current proposals. I propose a regulatory proposal as stated above. I propose the offence to be an infringement with a fine set at \$1000 to reflect both the potential for severe harm from such an act and the need for discouragement from this behaviour.</p> <p><a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a></p> <p><a href="https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/">https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</a></p>
Proposed	Young Calves	Minimum training standard for people handling/loading calves
		I propose a minimum training standard is put in place for people loading calves on to transportation. Footage from 2015 clearly shows inappropriate handling of calves at the time of loading. A regulation for minimum training standards for those loading calves will not just improve calf welfare but will also demonstrate the transport industry's commitment to improving their part of the calf management chain. In contrast failure for the transport industry to demonstrate willingness to improve welfare outcomes for calves could reflect badly in the media. I propose infringement penalty is prosecution due to the lack of provision of appropriate training being a corporation level infringement and therefore an

		<p>appropriate penalty needs to be significant enough to deter corporations from flouting the law.</p> <p><a href="http://safe.org.nz/nz-dairy-industry-exposed">http://safe.org.nz/nz-dairy-industry-exposed</a></p>
Proposed	Young Calves	Same day slaughter
		<p>I propose that all young calves received at a slaughter premises must be slaughtered that day and cannot be held overnight. It has been recognised by MPI that time off feed is a significant welfare concern in young calves therefore reducing the time spent at a slaughter premises aims to reduce the risk of calves spending an extended period of time off feed. Although an alternative proposal could be for feeding at arrival at slaughter premises given the other welfare issues of housing young calves I consider reducing holding time to a minimum as the least bad of the options. I propose an infringement penalty set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p>
Proposed	Young Calves	Use of nearest slaughterhouse
		<p>Increased time spent at transport has been shown to be one of the determinants of poorer outcomes for calves. For this reason I propose that calves are required to be slaughtered at the closest slaughter premises. I propose the infringement penalty to be set at prosecution level so that penalties are severe enough to prevent corporations flouting the law.</p> <p>Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
44	Young Calves	Shelter on farm, before and during transportation and at processing plants
		<p>I support the proposal for minimum standards of shelter on farm, before transportation, and at slaughter premises. I support the higher proposed infringement penalty of prosecution.</p>
45	Young Calves	Fitness for transport – age
		<p>I propose that the minimum age of transport is increased to 10 days to bring us in line with what is considered an acceptable standard of welfare in other developed countries. MPI have stated that the 4 day standard suggested in the proposed regulation has been suggested as this reflects current industry practice. However the transport code of welfare only cites research performed in calves 5-10 days of age, therefore I propose that the absolute minimum age of transport be set at 5 days of age. I support the most conservative determination of age – that it is determined from the time the calf is separated from the dam. I support the higher proposed infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p>
46	Young Calves	Fitness for transport – Physical characteristics



		I support the proposal that the list of physical characteristics provided with regulation 46 should be met prior to transport of young calves. I support the higher proposed infringement penalty of prosecution.
47	Young Calves	Maximum time off feed
		<p>I support the proposal for regulating the maximum time off feed for young calves, however we propose this is reduced to 12 hours. The lack of physiological indicators in the 2000 Todd paper<sup>1</sup> does not demonstrate that:</p> <p>this is in fact the case in calves &lt;5 days of age or</p> <p>that these calves are not experiencing significant hunger or</p> <p>that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study<sup>2</sup></p> <p>I propose that calves undergoing transport are kept to the same feeding schedule they would have if they remained on farm. I propose an infringement penalty of prosecution.</p> <p>Todd, S.E., Mellor, D.J., Stafford, K.J., Gregory, N.G., Bruce, R.A. and Ward, R.N. 2000. Effects of food withdrawal and transport on 5- to 10-day-old calves. Research in Veterinary Science 68, 125-134.</p> <p>Knowles, T.G., Warriss, P.D., Brown, S.N., Edwards, J.E., Watkins, P.E. and Phillips, A.J. 1997. Effects on calves less than one month old of feeding or not feeding them during road transport of up to 24 hours. Veterinary Record 140, 116-124.</p>
48	Young Calves	Duration of transport
		<p>I support limiting the duration of transport of young calves to 8 hours or less. As length of transport has been shown to be associated with poorer outcomes for calves<sup>1</sup> we propose an increase in the infringement penalty to \$1000.</p> <p>Cave J, G. Callinan A, P, L. Woonton W, K. Mortalities in bobby calves associated with long distance transport. AVJ 2005; 83: 82-84</p>
49	Young Calves	Blunt force trauma
		I support the prohibition of the use of blunt force trauma for killing calves. I support the more severe penalty of prosecution as this allows corporations to receive appropriate penalties to deter this behaviour.
50	Young Calves	Transport by sea across Cook Strait prohibited
		I support the prohibition of transport of young calves across Cook Strait. I support the more severe penalty of prosecution as this allows corporations to be held accountable.
Surgical and painful procedures regulatory proposals		

51	All animals	Hot branding
		I support the prohibition of hot branding and the penalty of prosecution.
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		I do not support the collection of embryos via exteriorised uterus and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		I do not support the use of laparoscopic AI and propose to prohibit the practice. In the event that it is not prohibited then I propose that the procedure is limited to veterinarians and directly supervised veterinary students. If the procedure is not banned outright then I support the proposal for pain relief to be mandatory and for a penalty of prosecution if pain relief is not used. Furthermore if the practice is not prohibited outright I propose that it is regulated separately under each species to ensure the law is clear in this regard (ie it is not currently appropriate for a lay person to perform this procedure on a pet cat or dog).
54	All animals	Liver biopsy
		I support the proposal for liver biopsy to be restricted to being performed by veterinarians or directly supervised veterinary students and the requirement for the use of pain relief. I support the infringement penalty of a prosecutable offence.
55	All animals	Dental work
		I support the proposal that any power tool used for dental work must be designed for the purpose of dentistry. I propose the infringement penalty is increased to \$1000.
56	Cats	Declawing
		I support the restriction of cat declawing to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a

		prosecutable offence.
57	Companion animals	Desexing (including stray/feral cats, dogs and other species)
		I support the restriction of desexing to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence. I purpose that all cats and dogs sold in pet shops be desexed and vaccinated before being released to the purchaser. This would work as a preventative step in helping reduce the number of stray/feral cats and dogs over time.
58	Dogs	Freeze branding
		I propose that freeze branding of dogs is banned. With better technology now available we can microchip dogs rather than freeze branding them. In the case that freeze branding is not prohibited I support the restriction of freeze branding to being performed only by a veterinarian or directly supervised veterinary student, and the use of pain relief at the time of the procedure. I support the proposed penalty of a prosecutable offence.
59	Dogs	Dog debarking (and devoicing of other species)
		I support the restriction of dog debarking to being performed only by a veterinarian or directly supervised veterinary student, only in the animal's best interest, and the use of pain relief. I propose that to ensure the procedure is always performed in the animal's best interest a consultation with a veterinary behaviourist is required prior to the procedure being performed, to ensure all non-surgical options for managing the behaviour have been fully explored. However I recognise this aspect of the proposal may be best administrated through the NZ veterinary council rather than MPI. I support the proposed penalty of a prosecutable offence.
60	Dogs	Cropping the ears
		I support the proposal to prohibit ear cropping of dogs. I support the proposed penalty of a prosecutable offence.
61	Dogs	Dew claws
		I support the restriction of removal of articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student for therapeutic reasons, and the use of pain relief at the time of the procedure. I propose restriction of removal of non-articulated dew claws to being performed only by a veterinarian or directly supervised veterinary student with the use of pain relief. I support the proposed penalty of prosecution.
62	Dogs	Tail docking