

- a. There has been insufficient time to consult on the wide range of issues that affect factory farmed animals.
- b. This would ensure the industry recognises that it is a big issue in itself and gives them increased warning that changes are likely to be implemented, thereby reducing any economic hardship.

Factory Farming – Farrowing Crates

- 15. NAWAC has already acknowledged that farrowing crates breach the Animal Welfare Act.
- 16. They have also states that there has been no change in the science regarding farrowing crates since the 2010 Code was released.
- 17. This being the case, it cannot be claimed that farrowing crates now meet the obligations of the Animal Welfare Act. There has been no change in the scientific evidence that suggests pigs are able to turn around, a normal behavior pattern, while confined in a farrowing crate.
- 18. MPI and NAWAC have adopted the view that because other systems have overall welfare outcomes as poor as farrowing crates, farrowing crates can be justified.
 - a. The Regulations Review Committee rejected this line of reasoning in 2006 in a similar ruling.
- 19. NAWAC and MPI claim that farrowing crates have no practical alternative currently available.
 - a. Clearly this is not the case and less intensive systems would have better welfare outcomes.
 - b. NAWAC states in their report, there are no alternatives for the current level of production desired by the pig industry.
 - c. The level of production should not be of interest to NAWAC. The Act does not require this to be considered. The only role of NAWAC is to improve animal welfare.
- 20. Even if it was the case that no practical alternative existed, the Act has a provision for this.
 - a. Section 183A clearly outlines a transitional clause to be used in these circumstances.
- 21. NZVS asks you to further investigate farrowing crates before allowing them to continue.

Factory Farming – Colony Cages

- 22. While the matter of colony cages is before Parliament in the Regulations Review Committee, it is not appropriate to consider the issue of colony cages.
 - a. The Regulation Review Committee had the option of outright rejecting the complaint if there was no merit to it.
 - b. MPI cannot possibly be engaging in good faith on the issue of colony cages when it is creating rules confirming the status quo despite the current case before Parliament.
- 23. As such, NZVS requests that regulations regarding colony cages are delayed until the ruling of the Regulations Review Committee is complete, and proper consultation can be made on the basis of that ruling.

24. NZVS also notes that the science has been ruled out of the scope of the Regulations Review Committee's jurisdiction.

- a. However, significant issues with the science have been uncovered by SAFE, and MPI is urged to consider these.

Factory Farming – 'Meat' Chickens

25. All arguments against factory farming apply to 'meat' chickens.

26. 'Meat' chickens suffer from additional problems of genetics which are being considered separately by NAWAC.

Factory Farming – Dairy Cattle

27. All arguments against factory farming apply to dairy cattle

28. The inherent problems with any intensive farming and the fact that it is not yet being used in relation to dairy cattle in New Zealand, means it can and should be ruled out now and doing so will prevent any economic losses to anyone who would invest in that industry.

Bobby Calves

29. Bobby calves are clearly not being treated with decent welfare considerations and this is unacceptable. These are babies and are subject to often severe mistreatment.

30. Insufficient time means this cannot be fully addressed but some of the issues that need to be resolved include:

- a. Increased minimum standards
- b. Implementing a process that ensures responsibility of calf mistreatment is clearly definable.

Rodeos

31. The Animal Welfare Act states animals should not suffer unreasonable or unnecessary pain or distress.

32. Rodeos clearly cause unnecessary pain and distress and since they serve no purpose other than a barbaric form of entertainment, the NZVS would like to see these banned outright.

33. The instigation and approval of violence and abuse that rodeos contribute to the community should also be a good reason to ban them. New Zealand already has one of the highest rates of domestic violence in the world. Allowing a form of abuse to be acceptable at a governmental level only intensifies the fact of abuse being acceptable in our country.

Live Export

34. There has been insufficient time to adequately research the issue of live export in relation to the proposals that the MPI has released.

35. Due to it being impossible to know and enforce how New Zealand's animals will be treated when they arrive at their destination, live export should be banned in all cases unless a complete traceability is possible and enforced.
36. Live export by sea should be banned completely due to the massive suffering it inflicts.

Private Ownership of Exotic Animals. Circuses.

37. It is unlikely that private owners could adequately meet the needs of exotic animals.
38. In particular, exotic animals suffer in circuses.
39. The NZVS would like to see a ban on the use of exotic animals in circuses. As this is currently not taking place in New Zealand no-one will be economically disadvantaged by doing so right now.

Other

40. The MPI is not required to alter regulations due to submissions calling for putting financial interests before animal welfare.
- a. The purpose of the Act is to improve animal welfare. It cannot be justified to place financial interests before animal welfare.
 - b. Section 183A empowers MPI to create regulations around standards of care.
 - i. This section clearly outlines how financial interests should be handled – transitional clauses may be invoked.
 - ii. Section 183A(9) clearly states that nothing in Section 183 creates an obligation to invoke transitional provisions for the sake of financial interests.
41. NZVS would like to express support for the mulesing ban proposed by MPI.
42. As we have previously called for, we strongly recommend an Independent Commissioner for animals.
- a. It is clear, from these proposed regulations and the MPI's concern over the number of submissions based on financial considerations rather than welfare, that an authority that has animal welfare as their highest concern should be implemented in order for issues of these kind to be managed with integrity and ensure that the animals they are supposed to protect are in fact protected.
 - b. Having a ministry that overviews both the farming industry and animal welfare involves a serious conflict of interests.

For any queries, please contact:

Stephanie Lane, BVSc
National Manager
NZ Vegetarian Society

s 9(2)(a)

✓ 207

From: Lynley Olsen s 9(2)(a) >
Sent: Thursday, 19 May 2016 8:01 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Submission
Categories: Blue Category

To Whom it may concern

I oppose the diminishing of any of the regulations proposed. I believe further steps should be taken to improve animal welfare.

I also believe there is a conflict of interest having MPI manage the Animal Welfare Act. Despite having NAWAC to consult with, I believe neither organisation is impartial. I believe there should be an entirely independent Commissioner for Animals.

No consideration should be given to the productivity of farms, costs to the farmers or the New Zealand economy or any individual or business when animal welfare is up for debate. The Act does not provide for this.

Please find below my comments on each of the proposals;

- 1) The use of electric prodders causes the animal pain and distress whether they are over or under 100kgs and should be prohibited.
- 2) I support this regulation however it does not go far enough. the penalty should be \$1000 or more dependent on how severe the cruelty is. even going as far as a criminal conviction and ban of owning animals.
- 3) I support this regulation, however the penalty should be increased to \$1000. or more dependent on how severe the cruelty is. even going as far as a criminal conviction and ban of owning animals.
- 4) I support this regulation, however the penalty should be increased to \$1000 or more dependent on how severe the cruelty is, even going as far as a criminal conviction and ban of owning animals.
- 5) I support this regulation, however the penalty should be \$1000 or more dependent on how severe the cruelty is. even going as far as a criminal conviction and ban of owning animals.

- 6) I support this regulation, however the penalty should be \$1000 or more dependent on how severe the cruelty is. even going as far as a criminal conviction and ban of owning animals.
- 7) I support this regulation.
- 8) I support this regulation. Repeat offenders should be banned from owning dogs.
- 9) I support this regulation, however the penalty should be \$1000 or more dependent on how severe the cruelty is. even going as far as a criminal conviction and ban of owning animals.
- 10) I support this regulation. Penalty should include a ban on owning any animal.
- 11) I support this regulation, Repeat offenders should be banned from contact with eels.
- 12) I support this regulation, Repeat offenders should be banned from contact with crustaceans.
- 13) I support this regulation however goats should not be tethered at all as they are herd animals and it will be stressful for them. however the penalty should be \$1000 or more dependent on how severe the cruelty is. even going as far as a criminal conviction and ban of owning goats.
- 14) I support his regulation but it does not go far enough. There should be a prohibition of striking a horse with anything as it will cause distress. however the penalty should be \$1000 or more dependent on how severe the cruelty is. even going as far as a criminal conviction and ban of owning animals.
- 15) I support this proposal. however the penalty should be \$1000 or more dependent on how severe the cruelty is. even going as far as a criminal conviction and ban of owning animals
- 16) I support this proposal. however the penalty should be \$1000 or more dependent on how severe the cruelty is. even going as far as a criminal conviction and ban of owning animals
- 17) I do not support hens in cages of any kind and fail to see how colony cages allow hens to display normal patterns of behaviour.
- 18) I do not support hens in cages of any kind.
- 19) I do not support hens in cages of any kind
- 20) I support this regulation. Repeat and severe offenders should get a criminal conviction and should be banned from owning animals.
- 21) I support this regulation, however the penalty should be \$1000 or more dependent on how severe the cruelty is. even going as far as a criminal conviction and ban of owning animals.
- 22) I support this regulation. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals.
- 23) I support this regulation. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals.
- 24) I support this regulation. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals
- 25) I do not support pigs housed inside or on non-litter systems in any circumstances or any confined spaces.
- 26) I support his regulation.
- 27) I do not support farrowing crates under ANY circumstances. Pigs cannot express their normal patterns of behaviour in crates which is a contrary to the animal welfare act.
- 28) I do not support sows in any farrowing systems as they cannot express natural patterns of behaviour.
- 29) I support this regulation. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals
- 30) I do not believe that any animals should be used in a circus for our entertainment.

- 31) I support this regulation I support this regulation. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals or dealing with cows.
- 32) I support this regulation. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 33) I support this regulation. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 34) I support this regulation. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 35) I support this regulation.. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 36) I support this regulation. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 37) I support this regulation. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 38) I support this regulation. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 39) I support this regulation. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 40) This regulation is too subjective. To be sure, it should be amended to say that an animal within a month on giving birth should not be transported. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 41) I support this proposal. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 42) I support this proposal. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.

Young Calf Management

I do not support calves being taken from their mothers until they wean of their own free will. Below are the minimum standards I would accept if this is not the case.

- 43) I support this proposal. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 44) I support this proposal. It does not go far enough and include have access to food and water. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.

- 45) I do not support this regulation and believe calves should not be transported until 2 weeks of age. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 46) I support this proposal. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 47) I do not support this proposal and believe calves should have access to water at all times and not be without food for more than 3 hours. They are already in a stressed state being without their mothers as newborns. The penalty should be a prosecutable offence with a criminal conviction.
- 48) I do not support this proposal. The Calves are already in a depressed state being without their mothers and should not be transported more than **3 hours** so as not to put them under even more stress. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 49) I support this proposal. Penalty should be more severe and result in a criminal conviction and a ban on owning animals and dealing with farm animals.
- 50) I support this proposal. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 51) I support this proposal. Penalty should be more severe and result in a criminal conviction and a ban on owning animals and dealing with farm animals.
- 52) I do not support this proposal. This procedure needs to be carried out by a qualified person or vet with pain relief to avoid any chance of the procedure going wrong and causing the animal pain and discomfort. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 53) I do not support this proposal. This procedure needs to be carried out by a qualified person or vet with pain relief to avoid any chance of the procedure going wrong and causing the animal pain and discomfort. The penalty should be \$1000 or more and repeat and severe offenders should get a criminal conviction and should be banned from owning animals and dealing with farm animals.
- 54) I support this proposal. Penalty should be more severe and result in a criminal conviction and a ban on owning animals and dealing with farm animals.
- 55) I support this proposal however it needs to go further and include pain relief. It is obvious that grinding teeth as in a human would cause discomfort and distress. Penalty should be more severe and result in a criminal conviction and a ban on owning animals and dealing with farm animals.
- 56) I do not support this proposal. Declawing is unnecessary as claws are there for a reason and their removal would cause distress to the animal. Penalty should be more severe and result in a criminal conviction and a ban on owning animals.
- 57) I support this proposal. Penalty should be more severe and result in a \$5000 fine and a ban of owning animals.
- 58) I support this proposal but fail to see how this procedure is necessary at all. Penalty should be more severe and result in a fine of \$5000 and a ban of owning animals.
- 59) I do not support this proposal as barking is a form of communication for a dog. I liken it to de-voicing a human. It is cruel and unnecessary. Penalty should be more severe and result in a fine of \$5000 and a ban of owning animals and a criminal conviction.
- 60) I support this proposal. Penalty should include a ban on owning animals.
- 61) I do not support this proposal as I believe all dogs claws should be left on their paws unless they are damaged. If they do need to be removed it shuld be performed by a vet with pain relief. Penalty should be more severe and result in a ban of owning animals.
- 62) I do not support this proposal under any circumstances. Tail docking should be prohibited as it is a unnecessary procedure only for aesthetic purposes. Tails are used by dogs as a form of communication and balance. Penalty should be more severe and result in a criminal conviction and a ban on owning animals.
- 63) I do not support this proposal. Teats should not be removed from an animal unless they are diseased and causing the animal pain and distress. In this case with pain relief by a vet. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.

- 64) I do not support this proposal. Claws should not be removed from an animal unless they are diseased and causing the animal pain and distress. In this case with pain relief by a vet. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 65) I do not support this proposal as I believe no teats should be occluded under any circumstances as this causes the animal pain and distress and is unnecessary. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 66) I support this proposal. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 67) I do not support this proposal. I believe pain relief should be used at any age if this procedure is necessary. Age is not a factor, just like a human baby, lambs and calves feel pain from the day they are born. It would appear that MPI are attempting to appease farmers with this proposal and animal welfare is not the priority. Imagine castrating a human baby with no pain relief? It wouldn't happen. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 68) I do not support this proposal. I believe disbudding is unnecessary and causes the animal distress and horns should be allowed to grow naturally. However worst case scenario I would support this proposal but the penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 69) I do not support this proposal. I believe disbudding is unnecessary as it causes the animal distress and horns should be allowed to grow naturally. However worst case scenario I would support this proposal but the penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 70) I do not support this proposal. I believe pain relief should be used at any age if this procedure is necessary. Age is not a factor, just like a human baby, lambs and calves feel pain from the day they are born. It would appear that MPI are attempting to appease farmers with this proposal and animal welfare is not the priority. Imagine taking a limb off a human baby with no pain relief? It wouldn't happen. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 71) I support this proposal. Penalty should be more severe and also result in a ban on owning animals and dealing with farm animals.
- 72) I support this proposal however it does not go far enough and pain relief for the animal should be included. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 73) I support this proposal. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 74) I support this proposal. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 75) I support this proposal
- 76) I support this proposal
- 77) I support this proposal. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 78) I support this proposal. I support this proposal. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 79) I support this proposal. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 80) I support this proposal. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.
- 81) I do not support this proposal. I believe pain relief should be used at any age if this procedure is necessary. Age is not a factor, just like a human baby, pigs feel pain from the day they are born. It would appear that MPI are attempting to appease farmers with this proposal and animal welfare is not the priority. Penalty should be more severe and result in a ban on owning animals and dealing with farm animals.

- 82) I support this proposal. Penalty should be more severe and result in a ban on owning animals.
- 83) I do not support dubbing of birds as it is unnecessary. Penalty should be more severe and result in a ban on owning animals.
- 84) I only support the declawing of emu chicks on medical grounds by a vet. Penalty should be more severe and result in a ban on owning animals.
- 85) I support this proposal. Penalty should be more severe and result in a ban on owning animals.

Yours truly,

Lynley Olsen

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

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

19 May 2016



Submission on Animal Welfare Regulations

This submission is made by World Animal Protection New Zealand.

World Animal Protection
Private Bag 93220
Parnell
Auckland 1151

Contact person:

Ingrid Giskes, External Affairs Project Manager Asia Pacific
s9(2)(a)

Submission

World Animal Protection is largely supportive of the new animal welfare regulations put forward and believes that in general they strengthen the applicability and implementation of the Animal Welfare Act as amended last year. We commend New Zealand for its excellent score in the Animal Protection Index that was published in 2014, however we want to highlight that this score should be an encouragement to keep improving animal protection and lead the way for other countries to do the same. Therefore, there are a number of outstanding issues which World Animal Protection considers still require addressing to ensure New Zealand's updated animal welfare legislation meets the welfare needs of our animals and the country's reputation for integrity.

Compliance and Enforcement regime (under Proposed Animal Welfare Regulations, point 4.0, p.16)

World Animal Protection considers that the proposed compliance and enforcement regime does not adequately address all proposed animal welfare offences, due to setting very low penalties for offending. We believe that the low penalties undermine the authority of both the regulations and the Animal Welfare Act. World Animal Protection therefore suggests that the more serious offences remain regulated by the principal Act and not be covered by the regulations.

More specifically, offences that World Animal Protection would like to see moved back up into the principal Act are:

- **Point 17: Layer hens – Opportunity to express normal behaviours in housing systems;** We consider that the proposed penalties and



especially those for a body corporate are too low and as such, the regulation will not achieve its stated aim and a transition to enriched/cage free systems will be undermined.

We suggest that the penalty for this offence and similar offences pertaining to a transition from practices that are currently not compliant with the Act (e.g. sow stall use) are raised to the same level as wilful ill treatment of an animal and regulated by the principal Act.

- **Point 18: Layer hens - Stocking Densities:** World Animal Protection considers that the penalties for offences under this regulation are too low, as per the arguments above, and that non-compliance should therefore be dealt with under the principal Act, rather than a regulation.
- **Point 19, p39: Housing and Equipment Design:** World Animal Protection considers that the penalties set for offences under this regulation are too low, as per the arguments above, and that non-compliance should therefore be dealt with under the principal Act, rather than a regulation.
- **Point 20, p41: Induced Moulting:** World Animal Protection supports this proposal. We agree that there should be no situations where moulting is accidentally initiated as it causes unnecessary distress and compromises the welfare of the hens. We consider that the penalty for offending needs increasing and, as such, the offence should sit under the principal Act instead of being a matter for regulations.
- **Point 24, p43: Dry Sleeping Area:** World Animal Protection believes that pigs should have access to dry, clean and comfortable sleeping areas to promote good welfare. We consider that the proposed penalty is not sufficient, especially if offenders are commercial farmers. We therefore propose for this to be considered as a regulatory offence rather than an infringement offence, considering the necessary trade-offs between compliance and enforcement.
- **Point 25, p44: Lying space for grower pigs:** World Animal Protection considers that the formula used should allow for more space per pig to allow for the increase in pig size during the life of the regulation. In addition, World Animal Protection strongly opposes the use of fully slatted floors. We consider that the proposed penalty for this offence is too low, especially noting that this is an area of frequent non-compliance, and that non-compliance should therefore be dealt with under the principal Act, rather than a regulation.
- **Point 26, p44: Dry Sow stalls:** World Animal Protection agrees with the prohibition of the use of dry sow stalls. We consider



that the proposed penalty is too low and should be increased to the same level as wilful ill-treatment in the principal Act, as stalls do not meet the requirements of the Act.

- **Point 27, p45: Size of farrowing crates:** World Animal Protection agrees with the proposal to prohibit the use of farrowing crates. However, we consider that the penalty needs to be increased or the offence moved back under the principal Act.
- **Point 28, p46: Provision of nesting material:** World Animal Protection agrees with the proposal that nesting materials should be provided prior to farrowing. However, we consider that the proposed penalty is too low or the offence should be moved back up under the principal Act.
- **Point 31, p48: Cattle - Milk Stimulation:** World Animal Protection agrees with the proposal. However, we believe that the penalty needs a significant increase and therefore suggest for this to be considered a regulatory offence rather than an infringement offence. We believe that this is a very outdated practice and offenders should be punished to the full extent of the regulations.
- **Point 34, p49 - Cuts and Abrasions:** World Animal Protection supports the proposal but queries whether the issue of 'cuts and abrasions' is well suited to an infringement offence, as there may be too much room for argument.
In any case, we suggest that an upper limit should be identified on the infringement offence and that a prosecutable regulation offence be created for any higher level of offending, since this is an area of frequent non-compliance. This could be done by defining 'any full thickness abrasion covering more than 5% of the back or neck' to be considered a prosecutable regulation offence. Responsibility should apply to the truck driver or company if this is where the injury occurs (i.e. during transport, not loading or unloading). Transporters, however, need more power to refuse to transport unsuitable animals.
- **Point 39, p54 - Animals that cannot bear weight evenly due to injury:** World Animal Protection agrees with the proposal but considers that the penalty is insufficient and that this should be considered as a prosecutable regulation offence instead, as this is an area of frequent non-compliance.
- **Point 40, p55 - Pregnant animals:** World Animal Protection agrees with the proposal but as an area of frequent non-compliance we consider that the penalty is insufficient and that this should be considered a prosecutable regulation offence rather than an infringement offence. This would more appropriately deal with the many complaints of animals late in their pregnancy giving



birth while being transported or in the yards of the slaughter premises causing distress to both the mother and her young.

- **Point 41, p56 - Animals with injured or diseased udders:** World Animal Protection agrees with the proposal but as this is an area of frequent non-compliance with current measures appearing ineffective, we consider that the penalty is insufficient to encourage compliance. Transporting animals with diseased or injured udders is unacceptable and should be considered as a prosecutable regulation offence rather than an infringement offence.
- **Point 42, p57 - Cattle or sheep with cancer eye:** World Animal Protection agrees with the proposal but considers that the penalty is insufficient. We therefore suggest for this proposal to be considered a prosecutable regulation offence rather than an infringement offence and also believe that it should be the veterinary profession/VA vets that determine the threshold for prosecution, as they have most experience with this issue.
- **Point 43, p60 - Loading and unloading facilities:** World Animal Protection largely agrees with the proposal but considers that the penalties are insufficient. As this is a new area for regulation with only limited minimum standards in place, we consider that it is better to make this a prosecutable regulation offence to increase enforceability and compliance.
- **Point 44, p61 - Shelter on farm, before and during transportation and at processing plants:** World Animal Protection largely agrees with the proposal and that putting the minimum standards into regulations is a good first step but as the penalties under the regulations are too low, we suggest for this proposal to be considered a prosecutable regulation offence rather than an infringement offence.
- **Point 46, p65 - Fitness for Transport (physical characteristics):** World Animal Protection agrees with this proposal, however we consider that the penalties are insufficient to ensure compliance with the regulations. Hence we suggest for this proposal to be considered a prosecutable regulation offence rather than an infringement offence.
- **Point 48, p69 - Duration of transport:** World Animal Protection agrees in principle with a maximum of 8 hours. However, we consider that the penalty is insufficient and provides no incentive for transporters and processors to comply. Hence we suggest for this proposal to be considered a prosecutable regulation offence rather than an infringement offence.
- **Point 49, p70 - Blunt force trauma:** World Animal Protection is pleased to see this being prohibited, however we consider that



the penalty should be prosecutable rather than being an infringement. Even though its use of blunt force trauma is declining, it should be clearly prohibited as a prosecutable regulation offence to ensure that other methods are promoted instead.

- **Point 50, p72 - Transport by sea across Cook Strait prohibited:** World Animal Protection agrees with this proposal. However, we consider that this should be a prosecutable regulation offence not an infringement with a very low penalty.

Layer Hens

- **Point 17, p. 38: Opportunity to express normal behaviours in housing systems:** World Animal Protection believes that in order to meet the welfare needs of layer hens and for hens to be able to express their normal behaviours, they cannot be housed in cages. Therefore, we do not support enriched cages as a suitable production system but instead suggest cage free systems that provide environmental enrichment. Please also note our comments on this point under the section on 'Compliance and Enforcement Regime'.
- **Point 18, p39: Stocking densities:** Generally speaking, World Animal Protection supports the current wording in the regulation. However we believe that pullets should have a minimum of 550cm² regardless of their age (under or over 19 weeks old).
- **Point 19, p39: Housing and equipment design:** As noted above, World Animal Protection opposes the use of cages for housing layer hens as their welfare needs to express normal behaviours cannot be fully met. However, the proposal under this point seems reasonable, but we suggest that the penalty for this offence and similar offences pertaining to a transition from practices that are currently not compliant with the Act (e.g. sow stall use) are raised to the same level as wilful ill treatment of an animal and regulated by the principal Act. We also note a potential conflict between points vii and ix: The former point requires hens to have access to good quality, friable litter at all times; while the latter point allows for some degradation of litter around outdoor access holes due to inclement weather. To mitigate this, we would suggest that an additional clause be added here, requiring producers to replace any degraded litter immediately to ensure welfare and behavioural needs can be met.
- **Point 20, p41: Induced Moulting:** World Animal Protection supports this proposal. We agree that there should be no situations where moulting is accidentally initiated as it causes unnecessary



distress and compromises the welfare of the hens. We consider that the penalty for an offence against the proposed regulation under this point needs increasing and, as such, the offence should sit under the principal Act, rather than being a regulatory offence.

Pigs

- **Point 24, p43: Dry Sleeping Area:** World Animal Protection believes that pigs should have access to dry, clean and comfortable sleeping areas to promote good welfare. If pigs are kept in a free range system where the pig can choose to sleep outside, a clean, dry and comfortable area should still be provided by the owner (even if the pig doesn't use it). We consider that the penalty under this proposal for an infringement offence is not sufficient, see comments above, and that it should be a prosecutable regulation offence instead.
- **Point 25, p44: Lying space for grower pigs:** World Animal Protection considers that the formula used should allow for more space per pig to allow for the increase in pig size during the life of the regulation. We feel that the regulation and formula as it currently stands should be future-proofed to avoid unnecessary suffering and to realise its full purpose. In addition, World Animal Protection strongly opposes the use of fully slatted floors. We consider that the use of this type of flooring should be prohibited and that comfortable and clean resting areas should be provided for the welfare and comfort of the pig. Noting the frequency of non-compliance in this area and that it is more likely to occur in commercial environments than small-scale holdings, we feel again that the penalty is too low as per our comments above and that non-compliance should therefore be dealt with under the principal Act, rather than a regulation.
- **Point 26, p44: Dry Sow stalls:** World Animal Protection agrees with the prohibition of the use of dry sow stalls as sows cannot express their natural behaviours and they are not good practice. In addition, World Animal Protection believes that mating stalls are not essential to good production systems as evidenced by other countries and producers that do not use them and as such would like to ask for the exception for mating stalls to be removed. We consider that as a regulatory offence, the proposed penalty is not sufficient as per our comments above.
- **Point 27, p45: Size of farrowing crates:** World Animal Protection agrees with the proposal to prohibit the use of farrowing crates as they compromise the pig's welfare and its ability to express

natural behaviour. We note that there are companies in China and Thailand who are already moving towards free farrowing, while this practice is also becoming more common in the UK. This shows that commercially viable alternatives are available making continued use of farrowing crates less tenable. However, we feel that the penalties for this offence need to be increased, as per our comments above. Thus, we support the proposal to ensure that sufficient space is provided but recommend that failure to comply should be an offence under the principal Act (instead of being a regulatory offence), due to the low cap on penalties for the proposed regulations.

- **Point 28, p46: Provision of nesting material:** World Animal Protection agrees with the proposal that nesting materials should be provided prior to farrowing to allow the sow to express natural behaviour. The materials should be chewable and provided at ground level to promote good rooting and nest building, both of which are very important to the sow.

Rodeos - Fireworks (Point 29, p46)

World Animal Protection does not support the holding of rodeos on animal welfare grounds. Rodeos serve no useful purpose for animals and the risk of injury to these animals is high. Holding rodeos is inconsistent and incompatible with New Zealand's reputation as a leader in animal welfare. World Animal Protection recommends a regulation be made to phase out rodeos in New Zealand.

Notwithstanding our position on rodeos we support the proposal for no fireworks, gas fired explosions or pyrotechnics of any type to be used at rodeos.

Exotic Animals used in Circuses (Point 30, p47)

World Animal Protection supports the proposal to restrict the use of exotic animals in circuses. However, we encourage New Zealand to go one step further and formulate a regulation to prohibit the use of exotic and all animals in circuses completely. This would see New Zealand follow the move of other countries around the world that have recently made this decision (see footnote below on P6 on the round-up of circus bans around the world).

Research has shown that methods of training animals to "perform", and the living conditions of circus animals, often cause them physical and mental suffering. Thanks to developments in science and the



dissemination of information, the public's understanding of animal welfare and its attitude to animals being kept in captivity for entertainment is changing. There has been a distinct tide against the keeping of wild and exotic animals in circuses, as the confined living conditions, constantly changing environment and requirements of performance cause suffering and stress to these animals. Animals in circuses live most of their lives caged in tiny enclosures which contain no or limited environmental enrichment, unable to interact normally with other animals of the same species. They often demonstrate stereotypic and abnormal behaviour patterns indicative of prolonged stress and suffering. Meeting the needs of captive wild animals, when they belong in the wild, is very challenging. For example, their interaction with people should be limited or non-existent, provision should be made allowing them to express their natural wild behaviour, such as roaming, foraging and interacting with each other, as they would in the wild. In some venues captive wild animals do receive adequate nutrition and medical treatment. This can lead to the misconception that they are not suffering. But, good animal welfare requires more than just physical health. Mental wellbeing, and the impact of the environment in which animals live, is just as important. Ultimately, the needs of wild animals can only be fully met in the wild. As circus animals do not contribute to any educational, conservational or scientific cause, their confinement and the requirement for them to perform have been concluded by many to cause unnecessary and insupportable cruelty. We have detailed this in our report *Wildlife on a Tightrope* which was published in 2010. An updated version of this report will be published this year.¹

This is the perfect opportunity for the New Zealand Government to respond by introducing a complete prohibition on the keeping of any exotic or wild animals in circuses. This would bring New Zealand into line with other countries that have already enacted laws in this area.²

¹World Animal Protection, *Wildlife on a Tightrope*, 2010. As well as Ridley RM, Baker HF; Stereotypy in monkeys and humans; *Psychol Med*; 12(1):61-72; 2008 2 Mason G, Rushen J; Stereotypic animal behaviour: fundamentals and applications to welfare; CABI; 9-16; 2006.

²Round-up of Circus Animal Bans Around the World - Nationwide ban on all animals in circuses: Cyprus, Greece, Malta, and Bolivia - Nationwide ban on the use of wild animals in circuses: Austria, Bosnia and Herzegovina, Croatia, Slovenia, Colombia, Costa Rica, El Salvador, Panama, Paraguay, Peru, Singapore, Israel and Mexico - Nationwide ban on the use of most wild animals in circuses: Belgium, Bulgaria, and The Netherlands - Nationwide ban on the use of certain species in circuses: Czech Republic, Denmark, Finland, Portugal, Sweden, and India - Nationwide ban on the use of native wild animals in circuses: Ecuador - Nationwide ban on the use of wild-born animals in circuses: Estonia, Hungary, and Poland - Local bans on the use of animals in

This change would have no financial effect on any business or entity, as no exotic or wild animals are currently held in any circus in New Zealand.

Cattle

- **Point 31, p48: Cattle - Milk Stimulation:** World Animal Protection agrees with the proposal that prohibits stimulating milk let-down by inserting water or air into a cow's vagina. However, World Animal Protection would like to add that Oxytocin should only be used for therapeutic reasons and under veterinary supervision when the welfare of the animal is of interest. In addition, we consider that the proposed penalty is insufficient and that this should be treated as a prosecutable regulation offence rather than an infringement offence.

Stock Transport

- **Point 34, p49 - Cuts and Abrasions:** World Animal Protection supports the proposal but suggests that an upper limit should be identified to enable prosecution to be taken for a higher level of offending if needed, as detailed above.
- **Point 35, p50 - Animals with ingrown horns:** World Animal Protection supports the proposal.
- **Point 36, p51 - Animals with bleeding horns or antlers:** World Animal Protection supports the proposal. Common sense should apply as a basic principle in the case of old injuries that have healed.
- **Point 37, p52 - Animals with long horns or antlers:** World Animal Protection recognises that this is a tricky issue but agrees with the proposal as we believe that a baseline needs to be set indeed. However, it needs to be ensured that there is a clear definition of how the horns are measured so this cannot be abused. In the case of velvetting, we strongly believe that this should be done by a vet or under the NVSB programme so that the issue of pain and distress caused by removing regrowth velvet can be mitigated. We suggest referring to the NVSB scheme in the regulation for velvet removal activities.
- **Point 38, p53 - Lamé cattle, deer, pigs and goats:** World Animal Protection disagrees with the proposal on two points. Firstly, we believe that setting an upper level of lameness above which an animal must not be transported may cause problems with management or disposal on farm and removes the veterinary opinion from the equation (i.e. undermining the veterinarian) which is

circuses: Ireland, Norway, Spain, UK, USA, Canada, Argentina, Brazil, Chile, and Australia.



not desirable. Secondly, we believe that sheep should not be excluded but included in this regulation. Until recently, there was little attention paid to pig lameness, however the situation is now changing, so the same should be expected for sheep. In terms of liability, we consider that the farmer and the transporter should be held liable for offences, but the transporter shouldn't be obliged to accept a lame animal for transport if responsibility is jointly applied.

- **Point 39, p54 - Animals that cannot bear weight evenly due to injury:** World Animal Protection agrees with the proposal but considers that the penalty is insufficient and proposes for this to be considered a prosecutable regulation offence rather than an infringement offence.
- **Point 40, p55 - Pregnant animals:** World Animal Protection agrees with the proposal but suggests that the period to not transport pregnant cattle, sheep, deer, pigs or goats that are likely to give birth during or shortly after transport should be extended to 48 hours as an additional precaution. We note that this proposal would likely affect the foetal blood collection industry, however as an animal welfare organisation this is not our concern. As an area of frequent non-compliance, we consider that the penalty is insufficient as per our comments above.
- **Point 41, p56 - Animals with injured or diseased udders:** World Animal Protection agrees with the proposal that animals with injured or diseased udders should not be transported, however we believe that the penalty is insufficient as per our comments above.
- **Point 42, p57 - Cattle or sheep with cancer eye:** World Animal Protection agrees with the proposal, but suggests that for this point and some of the other disease or injury states discussed above, if the animal is declared unfit for transport and a certificate is not issued by a veterinarian, then the animal must be humanely destroyed on the farm. If this is not stipulated the risk exists for additional unnecessary suffering to occur on farm until a prosecution under the Act is required. The penalty for this offence is insufficient as per our comments above.

Dogs

World Animal Protection supports Point 4 (Dogs - pinch and prong collars); Point 5 (Dogs - injuries from collars or tethers); Point 6 (Dogs - muzzling a dog); Point 7 (Dogs - dry and shaded shelter), and

Point 9 (Dogs - secured on moving vehicles), and agrees that an infringement offence is appropriate in each case.

World Animal Protection also supports the proposed regulation in Point 8 (Dogs - dogs left in vehicles). For this point, we suggest considering a graded system of offending, with infringement offences being issued as a deterrent (i.e., in most cases), but adding the possibility of a prosecutable regulatory offence (or prosecution under the principal Act) for cases where the dog suffers long-term harm (or death?).

We have considered Point 10 (Dogs and Cats - drowning dogs and cats). As a general comment, if there is an issue of low public awareness of the prohibition on drowning cats and dogs, then we would suggest that the focus be on increasing this awareness (e.g. by public information campaigns). That aside, however, we agree that issuing a regulation on drowning cats and dogs could be helpful (even given the potential risk of 'downgrading' section 12(c) of Act), as if this could be a strict liability offence, it may increase the likelihood of enforcement action against offenders (compared to a full prosecution under the principal Act).

Young Calf Management Regulatory Proposals

World Animal Protection, as an animal welfare organisation, fundamentally opposes the young calf or bobby calf trade. Notwithstanding our position, we have the following suggestions:

- **Communication and notification regarding unsatisfactory practice and outcomes (p58):**

World Animal Protection believes that the communication problems within the supply chain should not be left to the industry to solve but should be addressed under the regulations. While we support a regulatory approach, we also suggest that industry should make parallel improvements by - for example - requiring transport operators to notify collection routes and times well ahead of schedule and communicate changes as soon as possible after they occur. As real time GPS via mobile phones is now a reality, we consider that there is no excuse for transport companies and processors to develop applications to enable real time tracking of bobby calf consignments by themselves and farmers, which would help farmers better manage their stock and improve the welfare of the calves.



In addition, World Animal Protection suggests two further principles that need to be enshrined in the regulations to improve the welfare of bobby calves. Firstly, we would like to see the principle of 'shortest distance to slaughter' recognised which would minimise transport times and go some way in reducing the impact of increasing journey times towards the end of the calving season when calves are becoming scarce and more 'runts' are being presented for slaughter. Secondly, we would like to see the principle of 'priority slaughter' engrained in the regulations, meaning that those animals which have travelled furthest are slaughtered first, to reduce the impact of transport on their welfare.

- **Declaration of adherence to minimum standards (p58):**
World Animal Protection does not support this proposal. As bobby calves are considered 'low value' by the industry, farmers are unlikely to willingly comply with the minimum standards through a declaration approach. The proposal seems like an 'easy out' for farmers and undermines the value of the minimum standards set. In addition, asking the farmers for additional paperwork could further reduce the likelihood of compliance. Therefore, World Animal Protection feels that regulations are a simpler and easier way of achieving a better result as compliance is more likely, plus regulations will be enforceable.
- **Point 43, p60 - Loading and unloading facilities:** World Animal Protection deems the proposal acceptable however we would like the addition of the word 'suitable' so it reads 'Suitable facilities must be provided to enable young calves to walk into and off transportation by their own action'. This addition would ensure that ramps etc. are properly designed to avoid stress and injury. We consider that penalties are insufficient as per our comments above.
- **Point 44, p61 - Shelter on farm, before and during transportation and at processing plants:** World Animal Protection largely agrees with the proposal but would like to see that there should be sufficient space provided for all calves to lie down at the same time. We consider that the penalty attached to this proposal is insufficient, as per our comments above.



- **Point 45, p64 - Fitness for Transport (Age):** World Animal Protection does not agree with the proposed minimum age of 4 days old and would suggest a minimum of 5 days instead.

We believe that as a minimum, calves must have a dry navel, hardened hooves and be able to bear weight on all four limbs before they are transported.

- **Point 46, p65 - Fitness for Transport (physical characteristics):** World Animal Protection agrees with this proposal as per our comments under point 45, however we feel that the penalties are insufficient as per our comments above.
- **Point 47, p66 - Maximum time off feed:** World Animal Protection does not support this proposal. Despite the science, calves are monogastric (like humans) so likely to become hungry within 8 hours after their last feed. While this may not in itself constitute a major welfare problem, if left too long it will become an issue. We suggest a maximum of 16 hours, which would also have the effect of limiting transport times. 24 hours off feed in the case of a young, unweaned animal is a major reputational risk for the industry and something we feel they would want to avoid.
- **Point 48, p69 - Duration of transport:** World Animal Protection agrees in principle with a maximum of 8 hours, however in reality we can't see this being practical especially in South Island where 12 hours might be more realistic. We feel that 12 hours is a very long time but maybe more feasible for New Zealand's conditions. In addition, we feel that the penalty is insufficient as per our comments above.
- **Point 49, p70 - Blunt force trauma:** World Animal Protection is pleased to see this being prohibited (with an exception for emergency situations). World Animal Protection suggests to add a clear definition of what an 'emergency' is in order to avoid abuse of the regulation. We consider that the penalty is insufficient, as per our comments above.
- **Point 50, p72 - Transport by sea across Cook Strait prohibited:** World Animal Protection believes that slaughter should always take place as close as possible to the point of production to reduce stress on the animals involved. We agree with this proposal, therefore, and that transport across the Cook Strait



by young calves should be banned - it is uncommon and puts unnecessary stress on young, already compromised animals. As per our comments above, however, we consider that the penalty is insufficient and that this should therefore be a prosecutable regulation offence.

Surgical and painful procedures Regulatory Proposals

There is a growing understanding worldwide of the nature of pain and distress caused by routine procedures that impact greatly on the welfare of animals. World Animal Protection supports the proposal to define clearer regulations that will bring greater clarity in this area and reflect good practice and scientific knowledge.

World Animal Protection supports the proposal that pain relief should be given for husbandry procedures covered by the Painful Husbandry Procedures (PHP) code of welfare as well as those included in the proposed regulations (p77-111). We agree with the proposal that for pigs, tail docking over 7 days (Point 81, p108), and castration (point80, p107) should be done under pain relief and by a veterinarian or under supervision of a veterinarian.

Dogs

World Animal Protection supports Point 57 (Companion Animals - desexing); Point 58 (Dogs - freeze branding); Point 59 (Dogs - dog de-barking), Point 60 (Dogs - cropping the ears) and Point 61 (Dogs - dew claws), and agrees that a prosecutable regulation offence is appropriate in each case. We also welcome (and support) Point 62 (Dogs - tail docking), for the reasons outlined in the proposal and the welfare of the animal, and agree that a prosecutable regulation offence is appropriate.

Proposed regulations for the transport of live animals from New Zealand

World Animal Protection supports the proposal of the current conditional prohibition on livestock exports for slaughter (i.e. that the export of cattle, deer, goats and sheep for slaughter be prohibited, except with the consent of the Director-General of MPI and subject to any conditions he or she specifies) is prescribed by regulation under the Animal Welfare Act, on the expiry of the current CEPC. However, we strongly believe that an explicit and total ban would give greater certainty to the public and the industry and send



a strong message to the international community. New Zealand has led the way in setting the standard for so many issues relating to animal welfare and the opportunity to not only do the best for the welfare of animals but to also have a positive impact on the economic health and political arenas associated with trade should be taken. Therefore, World Animal Protection encourages the NZ government to obtain a broader definition of livestock (currently sheep, cattle, deer and goats) to also include pigs so that there are no loopholes for export for slaughter for these species in the future. World Animal Protection strongly suggests that the ban of live export for slaughter is worded to apply for all animals even those not traditionally seen as livestock.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Hickson, Rebecca <§ 9(2)(a)>
Sent: Thursday, 19 May 2016 7:20 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

Categories: Blue Category

I generally support the animal welfare regulations.

I suggest you consider a maximum live weight for castration of calves - in young calves, scrotal size is more related to live weight than age.

I'd also like to draw your attention to the trade in 4-day-old calves destined for rearing. In addition to the 2million bobby calves, some 800,000 calves of dairy industry origin are traded at 4 days of age for rearing as beef animals. Whilst there is a monetary onus on purchasers of these calves to handle and transport them with care because they need to remain healthy and viable for rearing, they nevertheless are at risk of welfare compromise. A significant number of early-born bull calves are transported from early-calving regions such as Waikato/South Auckland to regions such as Gisborne and Manawatu at 4 days of age.

A particular concern regarding the welfare of these calves is their colostrum intake. Consumption of high quality colostrum in the first 12-24 hours of life is a key part of immune development in calves, and calves that don't get fed this colostrum in the critical post-natal period are at greatly increased risk of infection and death in the first few months of life (there is plenty of literature to support this). I suggest it be an offence to sell for rearing a calf that has not been fed adequate colostrum. Such calves are likely to experience welfare compromise from disease.

Kind regards,
Rebecca Hickson

From: Diana Beswetherick § 9(2)(a)
Sent: Thursday, 19 May 2016 12:16 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations
Attachments: Animal Welfare Regulations Submission.doc

Hello

Please find attached an individual submission on the Proposed Animal Welfare Regulations (Care & Conduct and Surgical & Painful Procedures), and Proposed Regulations for Transport of Live Animals.

Thank you for your work in this area and the opportunity to comment.

Kind regards

Diana Beswetherick

§ 9(2)(a)

Phone: § 9(2)(a)
Email: § 9(2)(a)

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

18 May 2016

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

SUBMISSION ON ANIMAL WELFARE REGULATIONS

Thank you for the opportunity to comment on the proposed regulations. I am making a submission as an interested individual concerned about animal welfare and the humane treatment of animals. Through reading the discussion document, becoming more aware of some of the range of procedures we inflict on animals was sobering, and not enjoyable reading, I must say.

Overall, I support the proposed regulations and their objectives, as reinforcing improved treatment of animals and reflecting changed attitudes towards the welfare and wellbeing of animals. It is beneficial to have more visibility and enforceability in these areas and hopefully more effective deterrents for non-compliance. In principle, I think we should, wherever possible, cease management practices (particularly related to production animals) that cause any pain or distress to animals and the justification for continuing any such procedures should be thoroughly scrutinized. Economic arguments are not the only factors that are important to society. Likewise, mutilations to animals carried out solely for human aesthetic values, or convenience, are unjustifiable and unacceptable. There is no benefit to the animal in such situations, and significant harm.

Specific comments on each numbered proposal as detailed in Part B of the discussion paper (Care & Conduct and Surgical & Painful Procedures) are below.

As commented in the discussion paper, in many areas, standards of care, prohibited actions and welfare requirements are not well known. Even if these regulations are introduced, that indicates a need for broad communications about the new regulations to raise awareness. Awareness would be important for improved compliance.

Proposal Number	Subject	Comments
1.	All animals – electric prodders	Agree with proposal to prohibit use. But uncomfortable about exceptions. Disagree particularly with the exception for circuses. If danger/risk to human operator is involved, then they should avoid using animals that pose such danger. Entertainment is not adequate justification for causing pain and distress to animals. Consider that use of large animals in circuses is questionable and should be discontinued.

Proposal Number	Subject	Comments
2.	All animals – use of goads	Agree with proposal
3.	All animals – Twisting tail	Agree with proposal
4.	Dogs – pinch & prong collars	Agree with proposal. Don't see justification for use of these collars. Alternative means for training should be available, not a punitive approach. Agree that sale of such collars should be prohibited and penalties apply.
5.	Dogs – injuries from collars or tethers	Agree with proposal. Yes, agree regulation could cover all species restrained in this manner. And include "must not prevent drinking".
6.	Dogs - muzzling	Agree with proposal. Align with minimum standard, to allow drinking.
7.	Dogs – dry and shaded shelter	Agree with proposal
8.	Dogs – dogs left in vehicles	Agree with proposal
9.	Dogs – secured on moving vehicles	Agree with proposal. Agree it could be difficult to enforce, however having a regulation sends a clear message about expectations.
10.	Dogs & Cats - drowning	Agree with proposal. Drowning should absolutely be prohibited. And carry a conviction and penalty.
11.	Eels – insensible for desliming	Agree with proposal <u>but</u> would prefer it requires killing rather than rendering insensible, prior to desliming.
12.	Crabs, rock lobster etc, insensible before being killed	Agree with proposal
13.	Goats - Tethering	Agree with proposal. It would be useful to define shelter further. Perhaps specify shelter from wet, wind, excessive heat etc. Is there also a risk of entanglement with tethering goats?
14.	Horses – use of whip etc	Agree with proposal
15.	Horses – injuries from equipment	Agree with proposal
16.	Horses and Donkeys - tethering	Agree with proposal. Further comments as for goats
17.	Layer hens – behaviours and housing	Can the dates for compliance of housing or cage systems be brought forward? This seems a long time away. Given numbers, this is impacting a large number of hens.
18.	Layer hens - stocking densities	Don't feel able to comment on these standards.
19.	Layer hens – housing and equip design	Support bringing standards into regulation. Don't feel able to comment on appropriateness of standards.
20.	Layer hens – induced moulting	Agree with proposal
21.	Llama & alpaca – injuries from equipment	Agree with proposal
22.	Llama & alpaca – companion animals	Agree with proposal
23.	Llama & alpaca – offspring camelid companions	Agree with proposal
24.	Pigs – dry sleeping area	Agree with proposal
25.	Pigs – lying space	Agree with proposal
26.	Pigs – dry sow stalls	Agree with proposal

Proposal Number	Subject	Comments
27.	Pigs – size of farrowing crates	Agree with proposal
28.	Pigs – provision of nesting material	Agree with proposal. Include definition of material that clearly requires something that would meet the sow's needs. Eg, chewable, non-toxic, on-the-ground, nest-building material. hay?
29.	Rodeos - fireworks	Agree with proposal, as a minimum. Think it's time rodeos were banned entirely.
30.	Exotic animals – used in circuses	Agree with having enforceable restrictions. Would like to see these go further - support the prohibition of using exotic species of animals in circuses. The purpose for entertainment doesn't justify use of animals in that way. Should be restricted to domestic/pet species of animals only. Exotic species are unlikely to be able to express natural behaviour in a circus environment.
31.	Cattle – milk stimulation	Agree with proposal
32.	Cattle and sheep – vehicular traction in calving or lambing	Agree with proposal
33.	Cattle and sheep – ingrown horns treatment	Agree with proposal
34.	Stock transport – cuts & abrasions	Agree with proposal
35.	Stock transport – animals with ingrown horns	Agree with proposal
36.	Stock transport – animals with bleeding horns or antlers	Agree with proposal
37.	Stock transport – animals with long horns or antlers	Agree with proposal
38.	Stock transport – Lamé cattle, deer, pigs, goats	Agree with proposal
39.	Stock transport – Animals that cannot bear weight evenly due to injury	Agree with proposal
40.	Stock transport – pregnant animals	Agree with proposal
41.	Stock transport – Animals with injured or diseased udders	Agree with proposal
42.	Stock transport – Cattle or sheep with cancer eye	<p>Agree with proposal</p> <p>General comment regarding the stock transport regulations – would it be an option to combine all the conditions/lameness/injuries into one regulation?</p> <p>Where is the requirement to provide treatment to these animals for these injuries or diseases – is that being enforced?</p>
Young calf management		
43.	Young calves – loading and unloading	Agree with proposal. Standards/methods to be specified.
44.	Young calves - shelter	Agree with proposal
45.	Young calves – fitness for transport - age	Agree with proposal

Proposal Number	Subject	Comments
46.	Young calves – fitness for transport - physical	Agree with proposal
47.	Young calves – max time off feed	Agree with proposal
48.	Young calves – duration of transport	Agree with proposal
49.	Young calves – blunt force trauma	Agree with proposal
50.	Young calves – transport by sea across Cook Strait prohibited	Agree with proposal
Surgical and painful procedures		
51.	All animals – hot branding	Agree with proposal
52.	All animals – embryo collection	Agree with proposal. If non-veterinarians are performing the procedure there should be training requirements
53.	All animals – laparoscopic AI	Agree with the proposal
54.	All animals – liver biopsy	Agree with the proposal. Perhaps procedure could also be restricted to use in situations where there is no alternative.
55.	All animals – dental work	
56.	Cats - declawing	Agree restrictions must be in place. However the proposal does not go far enough. De-clawing should be prohibited – and only allowed for therapeutic reasons of disease/injury as described. Do not believe there are other circumstances where declawing is in the animal's best interests. If behaviour is "inappropriate" – because the owner doesn't like scratching - then animal should be surrendered and re-homed, not euthanased. Accepting natural behaviour is part of responsible pet ownership. This procedure is not justifiable for other than therapeutic reasons.
57.	Companion animals - desexing	Agree with proposal
58.	Dogs – freeze branding	Agree with proposal, however think it would be preferable if other, less painful methods of identification are used, if available.
59.	Dogs – debarking and devoicing of other species	As per comments for number 56, do not believe debarking is in the interests of the animal, if for behavioural issues. Accepting natural behaviour is part of responsible pet ownership. This procedure is not justifiable.
60.	Dogs – cropping the ears	Agree with proposal
61.	Dogs – dew claws	Agree with proposal. But, not sure why non-articulated hind limb dew claws would be allowed to be removed. It's not clear from the document what the benefit of this procedure is, if any.
62.	Dogs – tail docking	Agree with proposal. No justification for tail docking apart from to respond to injury or disease.
63.	Cattle – teats removal	
64.	Cattle – claw removal	Agree with proposal
65.	Cattle – teat occlusion	Unsure why this procedure is necessary at all – document does not say. Preferably would be prohibited.
66.	Cattle – tail docking	Agree with proposal

Proposal Number	Subject	Comments
67.	Cattle and sheep - castration	Agree with proposal
68.	Cattle, sheep & goats - disbudding	Agree with proposal. Arrangements to provide pain relief should be able to be made within a year.
69.	Cattle, sheep & goats - dehorning	Agree with proposal
70.	Sheep – tail docking	Support regulation and restrictions but it would be preferable if this practice was discontinued. The circumstances (must only be undertaken where...) outlined in the current standard could be included in the regulation. Why is pain relief not required for docking under 6 months of age? As a non-farmer, "must not be cut flush" is not particularly clear. Not flush with what?
71.	Sheep - mulesing	Agree with proposal
72.	Deer - develvetting	Agree with proposal
73.	Horses – blistering, firing or nicking	Agree with proposal
74.	Horses – tail docking	Agree with proposal
75.	Horses – rectal pregnancy diagnosis	Agree with proposal
76.	Horses – rectal examination	Agree with proposal
77.	Horses – Caslicks procedure	Agree with proposal
78.	Horses – castration	Agree with proposal
79.	Llama and alpaca - castration	Agree with proposal
80.	Pigs - castration	Agree with proposal
81.	Pigs – tail docking	Docking should only be done if really necessary to prevent tail biting – recommended best practice recommends other measures, so suggests they are available. Pain relief should be used regardless of age.
82.	Birds - pinioning	Unclear under what circumstances this would be in the best interests of the bird – eg why would it need to be confined in this manner? (Zoo code of welfare is mentioned).
83.	Poultry - dubbing	Unclear from document if this procedure is done simply for aesthetic reasons – that seems the case given mention of the poultry fancy sector. If so, it should be prohibited. No justifiable purpose, and it is mutilation.
84.	Ostriches & emus - declawing	Agree with proposal
85.	Roosters – caponising (castration)	Agree with proposal

Live animal exports

I also wish to make a submission on the proposed Regulations for the transport of live animals from New Zealand. Regarding the proposal below:

It is therefore proposed that the current conditional prohibition on livestock exports for slaughter (i.e. that the export of cattle, deer, goats and sheep for slaughter be prohibited, except with the consent of the Director-General of MPI and subject to any conditions he or she specifies) is prescribed by regulation under the Animal Welfare Act, on the expiry of the current CEPO.

I strongly oppose the export of livestock for slaughter because of animal welfare concerns, (both in transport and in holding and slaughter practices) and that it is not necessary. I support the continuation of the current prohibition through regulation. However there is clearly a provision in the proposal that would allow such exports to occur with the Director-General's consent and I am interested under what conditions consent would be granted and how likely this is to occur. This makes the proposal significantly less than a total ban and could be interpreted to mean an intention to allow the practice. In my view there should not be exceptions.

Sincerely

Diana Beswetherick

§ 9(2)(b)

Out of Scope

25/1

From: Julie James <§ 9(2)(a)>
Sent: Thursday, 19 May 2016 6:14 p.m.
To: Animal Welfare Submissions
Subject: Submission on animal welfare regulations.

Categories: Blue Category

Bobby calves not to be transported until 10 days old. They should have proper bedding while waiting and during transport. Treating them more humanly ie not throwing them. The time and distance traveled limited and must be slaughtered the same day.

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Dear MPI,

I am writing to object to your proposed banning of Hot Iron Branding.

First of all, I would like to point out that at no time has the cattle beast been "burnt through", it is only Tanned. This identification makes the animal easy to distinguish amongst others as an ear-tag easily falls out. "Nail tags" also; an ear mark grows hair easily to cover your mark; so a mix up with your neighbours makes i.d. simple.

I have eight neighbours who run cattle & find trying to i.d. theirs is nigh on impossible unless a sturdy yards is handy - most times not.

If you are going to ban "Hot Iron Branding" then Freeze Branding, tattooing, earmarking, tag application, Castration & Dehorning should be banned as well, just to satisfy the minority who have a different perspective about Farmers.

② ∴ At 55 years old → Farming all my life using Hot Iron branding, all care and compassion is given to make the process of branding as painless as possible, in fact it would be the least painful compared to the other processes of getting I.D. on your animal.

Being a 5th generation farmer on the same land this activity has been going on for more than a century without any problems so rewording the proposal banning "Hot Iron Branding" is a given from my perspective.

Luis Thacker.

ls-thl

§ 9(2)(a)

NAT no.

From: Lynley Tulloch § 9(2)(a) >
Sent: Thursday, 19 May 2016 5:08 p.m.
To: Animal Welfare Submissions
Subject: MPI Animal Welfare Codes Submission

Categories: Blue Category

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

Proposed change: The time between last feed and slaughter for young calves would be reduced from 30 hours to 24 hours

Response: Denying a young animal in his/her first two weeks of life sustenance for 24 hours is an act of cruelty. I propose that calves are not subject to this by making it illegal to send calves of this age to slaughter at all. The MPI cannot declare that it has high standards of welfare when this involves the denial of sustenance to animals of this tender age.

Proposed Change: Maximum truck journey times for young calves would be reduced.
Response: Young calves should not be transported at all. It is cruel.

Proposed Change: Handlers of young calves will be required to handle them properly.
Response: Again, 'proper' handling requires in the first instance that the calf be removed from his/her dam. This is again, an act of human cruelty against an innocent and defenseless young animal.

In brief, the proposed changes cannot be addressed with any level of integrity as they are based on a system that is cruel and outdated in the first place. The removal of a young calf from his/her dam, and the transport and slaughter of young calves is a breach of animal rights. I realize that the MPI operates from an 'animal welfare' position and does not consider the notion of animal rights. Because of this they are not operating from genuine concern for the life of the animal, only from a position of operating standards of welfare while all manner of atrocities are carried out against animals. The MPI should be stood down and an independent body set up to oversee the rights of animals.

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Best regards,
Lynley

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12-May-2016

Submission to Ministry for Primary Industries. P.O.Box2526 Wellington 6140.

From Murray Thacker. s 9(2)(a)

Hot branding of cattle.

s 9(2)(a)

I purchase beef calves each Autumn , grow them on for a year, then fatten them for another year, and send them to s 9(2)(b)(ii).

When arriving from s 9(2)(b)(ii), each beast is dosed with s 9(2)(b)(ii) and earmarked, debudded if necessary, and branded.

At no time is the beast damaged or beaten , they are a very valuable resource; and only take $\frac{1}{2}$ a minute or less to brand.

With their growing paddocks situated in s 9(2)(b)(ii), they are not handled again for a year when they are moved to fattening paddocks. I do loose an odd one over the cliffs..

When they are fat they are too big to be handled at all.

While the earmark is an early indicator of ownership, the brand is the only guarentee.

My nait number is s 9(2)(a). Tags are only visable when the beast is in a crush, which is certainly not practicable for a $2\frac{1}{2}$ year old beast.

It would be knocked around and bruised badly.

Please remember, we are trying our most to care for this, our income.

I submit that hot branding is NOT damaging to the beast and is more than compensated by its guarentee of OWNERSHIP.

Perhaps we should look more closely at the slaughter of New Zealanders in warfare , as is commemorated each year.

Murray Thacker. Q.S.M.

Murray Thacker

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Submission on Animal Welfare Regulations

mailto:Animal.WelfareSubmissions@mpi.govt.nz

Submitter

Lynda Griggs

s 9(2)(a)

Overall I support all changes to animal welfare regulations that improve the lives and welfare of animals and I support much harsher penalties for animal welfare abuse.

Animals are feeling sentient beings that deserve respect and the best possible care and handling, and how we care for them is a reflection on our society. New Zealand can and should do better.

I strongly oppose

- All live exports
- Keeping hens in cages – colony cages are no better (if not worse) than battery cages
- Animal abuse and weak penalties for abuse
- Painful procedures without proper pain relief
- Bad treatment and rough handling of bobby calves
- Intensive farming of pigs
- Rodeos
- Antibiotic use

Antibiotics

I oppose the practice of administering antibiotics to chickens (and all other farmed animals) just to prevent illness for those animals kept in conditions that cause illness. Animals should not be kept in these conditions. The practice also contributes to antibiotic resistance – a growing and serious problem with massive implications.

Animal abuse and penalties

Penalties should act as a deterrent as well as holding people accountable for their actions. Penalties are too low. Would animal abuse penalties be appropriate for abuse of a human? The suffering is the same for animal and human. Animal abuse often leads on to human abuse. Higher penalties and longer jail time offer better disincentive and would really say that NZ is serious about animal welfare.

Rodeos

Rodeos are completely unnecessary – it is animal abuse with no benefit – entertainment is not a good reason to subject animals to pain and distress, and sometimes death. Rodeos should be banned.

Bobby calves

My preference would be for bobby calves to not be produced at all and for lactation to be induced by alternative means eg. Hormonal.

I support all proposed improvements to handling of bobby calves. I am particularly concerned about the issue of getting the calves from the ground onto a high truck where they tend to be thrown. A mechanical lifting process should be used.

Live exports

Should not be allowed at all. Export for slaughter was banned and this should extend to export for breeding. The concerns that apply to one apply to the other. It causes the animals prolonged misery, an unacceptable number of deaths, and an uncertain future. NZ has no control over how the animals are treated in the destination country and this goes against our welfare standards. I don't think the Director-General of MPI should have the right to make exceptions and allow export.

Comments on Specific Proposals

1. Prodders

Increase penalties for multiple repeat offending

Guidelines for use (how not to use) should apply to slaughter situation as well as circus

Circus use - if needed for a circus animal that suggests the animal should not be there at all (Similar for 2. Goad)

3. Tail twisting

I can't see a legitimate reason to twist tails.

4. Prong collars

I think sale should be prohibited

5. Dog tethering

I think it is bad practice. Quality of life should be included here.

In particular the use of heavy chains should not be allowed

Must not prevent drinking

Should be some provision for the amount of space offered eg no short tethers. A running line is better than a tether, with less risk of entanglement, and should be encouraged instead of tether.

There should be limited duration, 24/7 not acceptable

Higher penalty (this is an area that generates complaints – address this more strongly)

6. Muzzling

Dog must be able to drink

Suggest limit on duration

Suggest excluding some inappropriate muzzling methods eg duct tape – high penalty for that

7. Shelter for dogs

Should include access to water

Shelter also as protection from cold and bad weather esp. snow, frost, storms

8. Dogs in cars

Frequent offending suggests the need for increased penalty for repeat offending.

Should not require actual death to be the only criteria for punishment, distress and risk of death are adequate criteria.

9. Securing dogs on moving vehicles

Secure in a way that would not lead to dog hanging itself if it fell off

10. Drowning

Yes absolutely ban this please

11-16 Agree

17. Chickens

Colony cages are no better (if not worse) than the outlawed battery cages. The amount of space available per bird is barbaric. Hens get trapped in parts of the cages and cannot free themselves, and cannot be easily freed by handlers, who then rip the birds out, tearing heads and limbs off live animals.

The use of these cages violates most of the 5 freedoms, and the clause stated that hens must be able to express normal behaviour

'Hens must have the opportunity to express a range of normal behaviours. These include, but are not limited to nesting, perching, scratching, ground pecking, and dustbathing.'

Not possible in colony cages.

Similarly 18. Density – inadequate

21-23. Llamas and alpacas – Agree with improvement in provisions

24,25. Pigs

I oppose high density practices – barbaric – no consideration for quality of life

Should include access to drinking water

Many complaints + 'Current enforcement responses are inappropriate for offending'

Unhygienic and overcrowded. And unpopular with general public

Pigs should be outside like sheep and cattle

More encouragement for free-range please

This area is in big need of improvement

Should be higher penalties

But difficult to improve this situation when intensive farming is legal

26. Ban of sow crates - Agree

27. Farrowing crates

I oppose farrowing crates – far too restrictive

29 Rodeos and Fireworks

Rather than just ban fireworks at rodeos – ban both Rodeos AND fireworks – both cause far too much distress for animals.

30 onwards Agree with all provisions for improving welfare of stock animals

Calves

43. Loading and unloading

Strongly agree that calves should be able to walk on/off

Strongly oppose current practices of throwing them

44-50 Agree with improvements for bobby calves

Would prefer than bobby calves are not produced at all and that alternative methods are used to induce lactation.

Painful procedures

51 onwards

Agree with improvements

56. Tail docking dogs

Ban it – totally unnecessary

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From: E K <9(2)(a)>
Sent: Thursday, 19 May 2016 1:31 p.m.
To: Animal Welfare Submissions
Cc: 9(2)(a)
Subject: submission

Categories: Green Category, Blue Category

Kia ora,

We would like to submit on the proposed animal welfare regulations in relation to:

- live animal exports
- care and conduct towards animals
- surgical and painful procedures.

We support in principle all proposed regulations that are aimed to increase the care and protection of animals. However we believe that the time between last feed and slaughter should be no less than 8 hours. Young calves should be able to stay at least 7 days with their mothers before they get transported and have dry navels and hard hooves. Reports on the welfare of animals during and after export should be undertaken by an independent provider and available to the public. We fully support the permanent ban on the export of livestock for slaughter.

Kind regards,
Elke and Philip Thompson

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Out of Scope

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From: Catherine Sinclair <s9(2)(a)>
Sent: Thursday, 19 May 2016 4:48 p.m.
To: Animal Welfare Submissions
Subject: Submission MPI no 2016/12
Attachments: Submission to MPI 2016-12 from C Sinclair.pdf

Categories: Blue Category

Dear MPI

Attached is my submission on the Proposed Animal Welfare Regulations (Care & Conduct and Surgical & Painful Procedures) MPI no 2016/12.

Best Regards
Catherine Sinclair

ph s9(2)(a)

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Submission regarding the

Proposed Animal Welfare Regulations
(Care & Conduct and Surgical and Painful Procedures
MPI Discussion Paper No.2016/12

From:

Catherine Sinclair RGON, BSc, Dip Art and Creativity

§ 9(2)(a)

I do not represent any organisation.

In general, I am pleased with many of the proposed changes and that these proposals aim to make animal welfare breaches more easily recognised and therefore addressed.

Infringements and Penalties

On the subject of addressing breaches I propose that the infringement fees and penalties be doubled from those which is proposed. As a country we need to take our animal welfare seriously and by having high maximum penalties this helps send that message. In addition there is a strong correlation between animal cruelty and violence towards people.

Therefore I propose the following:

- Infringements from \$600 to \$1000 depending on the severity of the offence to a max of \$2000
- Prosecutable offence under regulation:
Fine up to \$10,000 individual and \$50,000 body corporate.
- Prosecutable offence under the Act:
Penalties (range depending on the offence), Increase the majority of offences to have a penalty of up to: \$100,000, or up to 24 months imprisonment, for individuals, a fine up to \$500,000 for a body corporate.
- The most serious wilful ill-treatment offence should be up to: \$200,000, or up to 5 years imprisonment, for an individual, or a fine up to \$1,000,000 for a body corporate.

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:

- the species and size of an animal
- the manner of use of an animal (circus)
- the location of the animal (slaughter premises)

Tails

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 a higher level of \$600.

In addition I believe that docking of animal tails should be banned especially in

- dogs who use their tails for communication and balance
- and cows, as docking prevents them from being able to flick away annoying insects

Therefore I believe docking in these cases should be prohibited unless for animal health reasons.

DOGS

Pinch and prong collars

I support the prohibition of pinch and prong collars under ALL circumstances.

There should be NO exemption for dogs used for special purposes (guarding, military).

I understand the police have not used these for over 10 years.

I propose an infringement penalty of \$600.

I support the banning of the sale of these collars and associated penalties under the law.

Collars and 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.

Muzzles

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.

Shelter and Chaining

I support the proposal for dogs to have access to dry and shaded shelter at all times. I also propose 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.

Dogs left in Vehicles

I support the proposal re leaving dogs in vehicles as it may help 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 deterrent 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.

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.

Drowning of Dogs and Cats.

I fully support the prohibition of the killing of a dog or cat of any age by drowning.

I believe this should be a prosecutable offence.

LAYER HENS

Opportunity to express normal behaviours in housing systems

Keeping in mind that a hen's wingspan is approximately 75-80 centimetres (twice the size of a traditional battery cage) 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. (Sections 9, 68 Animal Welfare Act 1999)

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.

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 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 given that a hen's wingspan is approximately 75-80 centimetres. 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.

Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens. Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes Appleby, M.C. (1998) Modification of laying hen cages to improve behaviour. Poultry Science, 77: 1828-1832.) if they want to lay at the same time.

In order to satisfy a hen's need for perching, the housing system must be able to provide:

- Sufficient length of perching space to allow all birds to perch at the same time; and
- Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night.

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' Cooper, J.J. and Ablentosa, M. J. (2003) Behavioural priorities of laying hens. Avian and Poultry Biology Reviews, 14: 127-149.

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.

Ideally hens should have access to the outdoors during daylight hours.

Induced Moulting

I support the proposal to prohibit induced moulting of layer hens

PIGS

Dry Sleeping Area

I support the proposal that all pigs have access to a dry sleeping area.

I propose an infringement penalty of \$600.

Dry sow stalls

I support the prohibition of dry sow stalls

I support the proposed infringement penalty of a prosecutable regulation offence.

Farrowing Crates

I urge you to ban farrowing crates for sows completely.

Farrowing crates do not provide for the behavioural welfare of pigs when giving birth and nursing their piglets. There is no room for the sow to turn around: she can only stand up and lie down. No bedding is provided for nest building and her natural instincts are thus thwarted. This goes against the obligations of the Animal Welfare Act (1999), Section 10 of which requires that the "behavioural needs of the animal are met".

Other countries, such as Sweden and Switzerland have banned the farrowing crate. Without an immediate ban on farrowing crates we risk our international reputation by falling behind in animal welfare standards. I believe farrowing crates are unacceptable in modern day pork production systems and must be banned outright.

Nesting Material

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, ideally not in a Farrowing crate.

I agree 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, examples could be provided for guidance. ie Appropriate examples would include straw and sawdust.

RODEOS

Rodeos – Fireworks

I support the ban of fireworks at rodeo's. The loud noise of fireworks is well established as a stressor in animals and Unexpected noise and movement will cause fight or flight response in many animals.

In addition I would like to see a total ban on rodeo. 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.' One only needs to view you tube clips of animals in the Rodeo setting to see how frightened the animals often are. In particular the roping of young animals causing them to jerk to a halt and fall to the ground often causes injury to the animal as well as causing fright and 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 involved in rodeos could only be successfully minimised if rodeos were entirely stopped. Goading animals into states of distress eg with flank ropes is fundamental to getting them to "perform" in rodeo events.

Rodeo is of no advantage to the economy and is merely exploitation of animals for "entertainment" of people.

There have been many breaches of the rodeo code brought before MPI in 2014 and 2015. I strongly urge MPI to carefully consider if the codes are adequate in helping to minimise the likelihood of unreasonable and unnecessary pain or distress. I am aware new breaches 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 I feel that the only way to ensure these breaches do not continue is for an outright ban.

CIRCUSES

Exotic Animals Used in Circuses

I do not support the use of exotic animals, or indeed any 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.

CATTLE

Milk stimulation

I support the prohibition of the stimulation of milk let down by inserting water or air into a cow's vagina. I propose this include the insertion of any object into a cow's vagina to stimulate milk let down. I propose an infringement penalty of \$600

Vehicular traction in calving or lambing

I support the prohibition of the use of a moving vehicle to provide traction in lambing or calving. I propose an infringement penalty of \$1000.

Transport of stock, horns cuts etc.

I support these proposals

Calves

- Do not transport bobby calves before they are 10 days old.
- Do not confine bobby calves for longer than 2 hours while awaiting transport.
- Providing proper shelter, bedding and access to water for bobby calves awaiting transport.
- Providing proper bedding for bobby calves during transport.
- Ensuring humane methods for loading and unloading bobby calves. Throwing and dragging animals is absolutely unacceptable and is a punishable offence.
- The time and distance bobby calves are transported should be limited to 2 hours maximum – and drivers should be trained to drive appropriately.
- If a bobby calf for slaughter, this should be done on the same day as transport and should be done quickly and humanely.

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.

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.

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

CATS

Declawing

I DO NOT support the restriction of cat declawing. I propose that to ensure if this procedure is proposed then a consultation with a veterinary behaviourist is required prior to the procedure being performed. This would ensure all non-surgical options for managing the behaviour have been fully explored. However 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.

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 strongly 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.

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.

Dog debarking (and devoicing of other species)

I DO NOT support dog debarking. However if it is restricted I would support it is 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.

Cropping the ears

I support the proposal to prohibit ear cropping of dogs.

I support the proposed penalty of a prosecutable offence.

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 only, 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.

Tail docking

I do not support tail docking as dogs use their tails for communication and for balance.

However for therapeutic reasons only I would support the docking of tails in dogs. 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.

Lyndell Olley

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Section	Proposal	My feedback
43. Young Calves – Loading and Unloading Facilities	Facilities must be provided to enable young calves to walk onto and off transportation by their own action.	<p>In light of the footage broadcast on national TV last year showing calves being thrown as they were loaded onto and off trucks, I believe the proposed infringement offence with a fee of \$500 is inadequate. A fee of \$1000 is more realistic to reflect the seriousness of this behaviour towards young, vulnerable animals.</p> <p>Likewise for the same reason, the time frame for implementation of this requirement needs to be closer to 12 months rather than 24 months proposed.</p>
45. Young Calves – Fitness for Transport – Age	Young calves must not be transported for processing and slaughter until they are at least four full days of age.	<p>The 4-day old requirement has been in place (if only via a checklist) for a number of years. It is regularly flouted by suppliers as seen by calves presented at slaughter plants with wet and sometimes bloody navels, suggesting they were born within the last day or two. Anecdotally, transport drivers report seeing hair dryers in bobby calf pens, suggesting suppliers are using them to dry the umbilical cord to make the calf appear older than it is.</p> <p>Older calves seen at slaughter premises appear far more healthy and robust, so I support raising the minimum age for transport to match the EU (10 days). If NZ wishes to be a world leader in animal welfare then we should match the standards of one of our largest trading partners.</p>

Section	Proposal	My feedback
46. Young Calves – Fitness for Transport – Physical Characteristics	<p>Immediately prior to transport, young calves must:</p> <ul style="list-style-type: none"> • be free of disease, deformity, blindness or any disability; • be alert and able to rise from a lying position and, once up, capable of moving freely, are not listless and are able to protect themselves from trampling and being injured by other calves; • have hooves that are firm and worn flat and not bulbous with soft unworn tissue; and • have a navel cord which is wrinkled, withered and shrivelled and not pink or red coloured, raw or fleshy. 	<p>Calves with contracted tendons are occasionally delivered to slaughter premises when transport drivers pick up and carry the calves onto trucks. Calves with pink, fleshy, bloody navel cords are seen at slaughter premises regularly.</p> <p>Another aspect that is not considered by this proposal, is what happens to the calves that the transport operator rejects as not fit for transport? For example, if a supplier books (say) 20 calves for pickup but the transporter decides 10 look too young/sick/not fed so only accepts the 10 healthy ones, what provision is there for the welfare of the rejected calves? This scenario happened many times at the slaughter premise I worked at.</p>

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Section	Proposal	My feedback
47. Young Calves – Maximum time off feed	Young calves up to 14 days old that have been collected for transport to slaughter or are awaiting slaughter must be fed or slaughtered within 24 hours of their last feed.	<p>This is wholly inadequate. There is a strong correlation between length of time to slaughter and pre-slaughter mortality. "Same day kill" (i.e. slaughtered within 12 hours from pickup) results in significantly lower pre-slaughter mortality (data available on request). Stronger calves that do not die or become so weak that they must be shot in yards, show behavioural signs of extreme distress from hunger. They vocalise continually and mob any human who approaches or enters the pen. Weak or moribund calves are trampled underfoot until they can be extracted. They suckle compulsively at clothing or body parts (legs, fingers) of humans entering the pen. A period of 24 hours starvation for an adult animal is acceptable but for a neonatal animal, it is far too long. Aside from the severe stress demonstrated by the hungry calves, it is also very distressing for the staff who have to deal with the animals. Many yard staff have expressed disbelief that "baby animals" can be treated so badly and are amazed that MPI allows it. They often expressed the view that filmed footage of starving "next day kill" calves would not only be distressing to the public but also very damaging to NZ's reputation for animal welfare.</p>

Section	Proposal	My feedback
		<p>Also, the research that shows no significant physiological harm from withholding food for 30 hours was done on healthy calves. A not insignificant number of calves submitted for slaughter are not healthy. They are often not showing any clinical signs at time of pickup by the transporter but as the 30 hour limit approaches, many of these calves succumb to infections resulting from either lack of feeding on farm or lack of colostrum intake. Extremely common conditions seen multiple times every day include polyarthritis (infections in multiple joints), navel infections, diarrhoea. Towards the later half of the calf processing season approximately 60-75% of the calves present with diarrhoea. If the presence of diarrhoea precluded the calf being sent for slaughter, then there would be a very large reduction in the number killed at slaughter premises. Less frequently seen is starved calves that were fed just prior to transport - post mortem findings are emaciation (no internal fat on the heart or kidneys) and milk in the rumen (usually a sign of tube feeding). In my opinion as a veterinarian, a calf that dies in the yards waiting to be slaughtered or becomes moribund that requires it to be shot in the yard, experience significant pain and distress.</p>

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Animal welfare proposed regulations feedback submission form

Your name: MS JULIA SHANNON

Your organisation (if applicable): COMPASSION IN WORLD FARMING, HOME FARM
ORG, PT

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

email: s 9(2)(a)

Your feedback: My Submissions - Proposed Animal Welfare
Regulations MPI Discussion Paper No: 2016/12

Firstly I have read through the Proposed changes
in every account and although most are of a minimum
standard I feel these proposals will provide for improved
Animal Welfare and much clearer laws protecting
all animals from abuse. However I have my own
Submissions on the following proposals.

11.00 Young Calf Management

11.2.2 Yes I agree that there must be a declaration
affirming (the keeper) has complied, is compliant with
the minimum standards of care. There is NO EXCUSE not to.
These are very young and vulnerable, to neglect and abu
and need extra legislative protection and record keeping.

11.3. Yes and as to the 'question' yes as there will be
exceptional circumstances, for example if the keeper died.

45. Young Calves - Fitness for Transport - Age

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

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

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

Submissions close 5pm 19 May 2016.

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



Animal welfare proposed regulations feedback submission form

Your name: J Shannon

Your organisation (if applicable): _____

Your contact details: _____

Your feedback: 45. Young Calves - Transport-Age

Proposal - I believe a minimum of 7 days is more humane as some calves particularly ~~the~~ Friesian's are small and less developed than some other breeds. I kept seven cross bred bobby calves last year 4 were 4 days old three were seven days old and the difference in ability was evident throughout. The younger ones needed one to one help with feeding and were needing to be separated from the older calves. Two needed extra nutrition and TLC. All eventually thrived well and are now well grown at 9 months. I consider that many calves are being transported and delivered to slaughter, young, hungry, and weak which is cruel practice.

Every calf ^{BIRTH} should be recorded with a date, am or pm time and supplied to the purchaser/transporter ect on the movement record or attached with it, then there should be

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

P70

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

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3/no question about the age of the calf. This is also good practice for recording births and deaths, with an accurate date and time and should a disease or illness be found this information would be invaluable.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982



Animal welfare proposed regulations feedback submission form

Your name: J. Shannon

Your organisation (if applicable): _____

Your contact details: _____

Your feedback: 47. Young Calves - maximum time off feed.

I have reared Bobby calves for thirty years both in New Zealand and in the U.K. The last calves I reared were born late August + Sept 2015 and I collected seven calves at 4 - 7 days old. To expect a very young calf to be moved and or left for more than twelve hours without feeding is cruel and unacceptable. Calves by nature demand feed and although I don't agree with it do know some calf rears feed their seven day plus calves every twelve hours. I feed mines six hourly and they are always excited and hungry by that time. I suggest young calves should be fed no longer than six hourly at any time, but except 12 hourly to be a very basic minimum requirement. I know a calves inner organs digestive tract etc will be adversely effected as will their whole demeanor causing further illnesses. Feel free to continue your submission on additional paper and staple it to this form.

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

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

Submissions close 5pm 19 May 2016.

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Suffering;
this cr
practice
denying mil
feed is allow
to contin



Animal welfare proposed regulations feedback submission form

Your name: J. Shannon

Your organisation (if applicable): _____

Your contact details: _____

Your feedback: 49. Young Calves - Blunt force trauma

It is unbelievable this cruel, barbaric, uncivilised method of killing any animals and young calves was not made illegal last century. Unfortunately some of the people working with young animals have no empathy or idea regarding animal welfare or their Right. These people should be eliminated from working within the farming sector, permanently. (Blunt force trauma) is a disgrace to New Zealand.

(c) (iii) Persons undertaking humane destruction --- These persons must be suitably trained?

The persons who undertake humane destruction of cal with a firearm or captive bolt, should be trained through an agricultural college, vet college ect and hold a licence and qualification and be routinely checked upon to make sure their procedure's are humane. This recommendation I consider important and should be a mandatory requirement. Oth

Feel free to continue your submission on additional paper and staple it to this form.
Please place your feedback inside the feedback box. Alternatively, take this form with you than th and post your feedback to Animal Welfare Policy, Ministry for Primary Industries, PO Box a farm 2526, Wellington 6140. can call someone who is licenced to dest the animal is a professional and humane way.
You can also email your feedback to animal.welfaresubmissions@mpi.govt.nz

Submissions close 5pm 19 May 2016.

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

6

I have read the Proposal, but do not feel this protects the pain that the sheep will suffer enough.

My submission is,

sheep Tail docking should be done within the first 48 hours of birth by the rubber ring method.

This practice should only be performed by an experienced or trained and knowledgeable person as they are handling young & frightened animals.

It must be illegal to cut tails flush. A minimum tail length to cover the vulva or the anus must be required.

Ewes who have flush cut tails, (and there are many) can suffer sunburn, flies landing on her and irritation. The flush tail cutting that is happening here in New Zealand is unusual and I have not witnessed this crude practice in other countries. Plus the ewe is left with no dignity at all. wonder why some farmers need to cut ewes tails flush? Lets stop this happening in future.

Tail docking with a hot iron should not be done unless carried out by a vet under anaesthetic. This is a potential dangerous and skilled procedure and requires the person to be qualified or experienced or the pain to the animal can be greatly unnecessarily increased.

Submission 10.0. CARE AND CONDUCT PROPOSALS
27. Pigs - Size of farrowing crates

1st I would like a total ban on farrowing crates.

If crates are still allowed but fall in line with the new proposals, I consider that the sows should be given freedom to roam outside of the crate every 6-8 hours so she can stretch, exercise and root. Otherwise her life is an intolerable entrapment, prison, equivalent to torture.

Submission 17. & 18 Layer hens:

I agree with the Green Party totally on all counts regarding battery hen cages and enhanced cages. The minimum requirement for laying hens accommodation should be within the Barn system. I do not believe anyone needs to eat caged hens eggs at all. This cruel abnormal practice should have a total ban.

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8/ Dog commercial breeders and puppy farms.

This is my submission to MPI to change the law to protect large scale dog breeding in New Zealand.

It is becoming a big industry to breed dogs in N.Z. Some breeders are licenced and care very well for the breeding dogs and their puppies.

However some unscrupulous dog breeders are now going unnoticed by the current system of licencing and animal welfare, often until immense suffering has occurred.

All commercial dog breeders, those having dogs just for breeding, and having many litters and selling a substantial amount of puppies (50 plus a year) should have to be licenced, pay a fee and be given regulations for their animals' welfare and care. They should be visited by a dog warden or animal welfare officer regularly - twice a year minimum to check that the dog, puppy care standards are being upheld.

Submission for making it illegal to eat Canine and Feline animals.

As New Zealand's population becomes multi cultural, does the diet preferences of some New Zealanders. This is a real and great worry for New Zealand's (clean, pure) image. Eating a dog off a barbeque article which appeared on Stuff.co.NZ by Neil Reid 16/08/2009. Recently two of our cats disappeared along with another five in our area?

There is an up and coming desire to eat canine¹³ meat a

9/ Owners (because alot are and will be stolen) and it will cause new or old diseases and potentially will contaminate our food supplies. This will also have a devastating impact on our global reputation. If some people are allowed to get away with eating dogs and cats like in New Zealand, then we will probably introduce some horrific mad cow disease type illness.

Surely MPI must be concerned about possible illness, disease and this infiltrating our food chain. The animal welfare issue here is relevant also to the up and coming puppy farming, as with no legislation and rules dogs can be bred on mass scale for human consumption. In China it is acceptable to eat canine and feline meat!

Nicki Robinson 220

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
		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).
		<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) http://safe.org.nz/nz-dairy-industry-exposed 2) https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</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

		<p>insensible before they are killed. I dispute the NAWAC statement that chilling to <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 <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
		<p>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.</p>
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. 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. 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"> • Sufficient length of perching space to allow all birds to perch at the same time; and • Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night. <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 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 believes the formula intended by MPI should read "live weight^{0.67} (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. Therefore I contend that proposal 25 must be rewritten and resubmitted</p>

		<p>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.</p> <p>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"</p> <p>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.</p> <p>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. 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.</p>
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		http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&context=kaesr [ibid. Page 9 "ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 < https://www.mpi.govt.nz/document - vault/1446 >
26	Pigs	Dry sow stalls
		Proposal: I support the prohibition of dry sow stalls Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.
27	Pigs	Size of farrowing crates
		<p>Proposal: I do not support the use of farrowing crates. 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".</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 http://www.nzpork.co.nz/images/custom/farrowing - crate - advice - 14 - march - 2016.pdf Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042 KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. http://www.sciencedirect.com/science/article/pii/S0167587711003564 </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</p>

		<p>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.</p> <p>http://www.ncbi.nlm.nih.gov/pubmed/20889685</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).
		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. http://safe.org.nz/nz-dairy-industry-exposed

		https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/
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. 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>http://safe.org.nz/nz-dairy-industry-exposed</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 is 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
		<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> <p>this is in fact the case in calves <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</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, 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	Compani on 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 >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:</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</p> <p>pain relief is required for any supernumerary teat removal procedure regardless of age</p> <p>ii) infringement penalty of prosecution</p> <p>procedure is performed using sterilised equipment</p> <p>iii) infringement penalty of \$500</p> <p>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
		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.</p> <p>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 > 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 < 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.</p>
71	Sheep	Mulesing
		I support the proposal to prohibit mulesing. I support the proposed infringement penalty of prosecution.
72	Deer	Develvetting
		I support the proposal for develvetting 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.

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Out of Scope

From: Chris <§ 9(2)(a)>
Sent: Thursday, 19 May 2016 4:34 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations
Attachments: Personal submission Animal Welfare Regulations.pdf
Categories: Blue Category

please find attached my submission on the proposed animal welfare regulations

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Out of Scope

From: Chris <s 9(2)(a) >
Sent: Thursday, 19 May 2016 8:58 p.m.
To: Animal Welfare Submissions
Subject: Re: Automatic reply: Submission on Animal Welfare Regulations

Follow Up Flag: Follow up
Flag Status: Completed

Out of Scope

Sent: Thursday, May 19, 2016 at 4:34 PM
From: "Animal Welfare Submissions" <Animal.WelfareSubmissions@mpi.govt.nz>
To: Chris <s 9(2)(a) >
Subject: Automatic reply: Submission on Animal Welfare Regulations

Thank you for your submission on the proposed animal welfare regulations that the Ministry for Primary Industries is currently consulting on. If your e-mail relates to a question about the proposals, rather than being a submission, please direct your query to animalwelfarepolicy@mpi.govt.nz.

After consultation the next step in the process will be for the Ministry for Primary Industries to analyse the submissions, produce a summary of submissions, and make the summary of submissions available on its website www.mpi.govt.nz.

All submissions received will inform the final proposals to Government.

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Christine Rötzel

s 9(2)(a)

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

I have been living and sometimes working on a dairy farm for about 18 years. I am a hunter and a German Shorthaired Pointer owner and have bred a few litters in the past. I am a member of the Auckland & Regions German Shorthaired Pointer Club and the NZ Council of Docked Breeds but am making this submission on my own personal behalf. As well as the German Shorthaired Pointers we also have other gundog breeds, dogs for working stock and a cat that is a bit slack at catching rats.

I do wish to comment that I find the lack of consultation and the general lack of awareness of these proposals among the pet and animal owning population to be alarming. Of all the people I asked only a local sheep farmer was aware of some of the proposals. I think that the speed that these proposals are being pushing through without everyone being aware of what is happening and debating the likely outcomes is certainly not a democratic process. To have NAWAC made up of so many bodies with vested interests in the outcomes is also a huge concern, there needs to be and should be independent members of NAWAC to represent the "reasonable man".

Proposal 1

All animals - Electric prodders

Why is 100kgs the minimum weight for this? This is the weaning weight for beef or friesian dairy calves - so we are talking calves that are around 3 months of age.

If this is for the benefit of truckers then perhaps consideration should be taken into account that the lighter dairy breeds - jersey and kiwi cross have a lower recommended minimum weaning weight. Weaner calves - both dairy and beef are often trucked at weaning to grazing.

Personally I think if a prodder is needed to be used on animals as young and small as this then there is an issue with the stockmanship abilities of the handler. I think consideration should be given to a minimum age, I would prefer this at around 9 months as anyone can still put rubber rings on bull calves up until 6 months old so you'd think they would still be pretty manageable up until that age at least. I think it should be stressed that an electric prodder be used only if the safety of the handler is an issue and to move difficult animals.

Note: any use of a prodder will cause (momentary) pain not just misuse.

Proposal 2

Prohibit use of a goad to prod an animal in the udder, anus vulva scrotum or eyes

Generally agree but would like to see the word "deliberate" inserted. Can see accidents happen when an animal is prodded on the rump and a trip or stumble or sudden direction change by the handler or animal means the goad does not touch where intended.

Prohibit the deliberate use of a goad to prod an animal in the udder, anus vulva scrotum or eyes.

Note: any use of a goad in these areas will cause pain not just misuse

Proposal 3

All Animals - twisting an animal's tail.

As a dairy farm worker I can say that wherever we have farmed bending a tail is done seldom and only is there is an issue where the safety of a worker is at risk. If the animal that is being held by the tail suddenly panics and as a result the hold causes pain or worse a break but it is not deliberate I don't think an infringement is warranted.

The wording of the proposal is also too subjective "in a manner" can be interpreted in different ways by different persons and in the event of breakdowns in employment relationships this may possibly be interpreted "differently" by the witnesses some time after the fact.

Proposal 4

Dogs - Pinch and Prong collars

I don't think the use of these should be prohibited but the person using these should have a sufficient skill level. The emotive photo that has been published internationally of the dog with the neck injuries is a case of animal abuse as the handler has seriously misused a training tool. A pinch or prong collar used properly means that a dog that has previously been mistreated and inadvertently taught to pull on a lead in some or all circumstances can be quickly taught to walk "loose lead" as the collar tightening on the neck can be self corrected by the dog, but again a degree of skill is required by the handler as the dog needs to know what "loose lead" walking is first and be positively reinforced for doing so.

It is the lack of skill in use that causes the dog injury that is the offence. I don't think that the skill level of defense or police trainers is higher than other trainers, In reality a pinch or a prong collar is not a training tool that a trainer would reach to first. Similarly I can see that in your discussion that you are possibly fishing to extend this out to other forms of devices such as e-collars and check chains. Again another issue where the tool is blamed instead of the lack of skill by the handler.

I would remove the current minimum standard or add the words "in such a manner as to result in a physical injury to the dog"

Proposal 5

Dogs - injuries from collars or tethers

I am not sure why this proposal is only for dogs - should be expanded to include all animals but other than this I agree with this one.

Proposal 6

Dogs - muzzling a dog

The proposal does not allow for muzzling an injured dog so that it can be safely moved/restrained for veterinary treatment.

I think that "abrasions" should be better defined - minor rubbing of the coat away (not really an issue as I see it) or where the skin has "grazed" (a cause for concern) - . Other than that I agree with this proposal.

Proposal 7

Dogs - dry and shaded shelter

I prefer the wording of the minimum standard to the wording of the proposed regulation

Proposal 8

Dogs - dogs left in vehicles

I'm not sure why this is restricted to dogs and not other companion animals as well.

If it becomes a prosecutable regulation offence are the penalties not more than what has been recently imposed by courts on parents that have inadvertently left their children in a vehicle? Is the distress and guilt felt by owner of the dog or cat or other pet that dies or suffers of heat stress in such a circumstance any less or more than a parent?

I think the proposal defines the symptoms of heat stress quite well although I don't think it will deter those that will complain about a child or animal left in a car for any reason. Personally I have been berated by people when I have parked and left dogs in the car, even though the back of the car is open but with the dog crates locked, cool coats on the dogs and access to water - all this so I can go to the toilet - usually after the dogs have been run/walked first. I now seldom travel with animals in the car unless there is a second person with me so there is someone always with the car as the situations can get quite abusive. This is not possible for everyone or in all circumstances though. The removal of trees and other shade to fit more parking spaces in is also an issue.

I would like this to be an infringement as I don't see pet owners deliberately leaving their pet in a vehicle to "cook to death". In all the circumstances that I am personally aware of where there has been a pet death there has been something unavoidable that has delayed the owner from getting back to the vehicle in time so I don't see the infringement as a deterrent factor for the vast majority of people. In areas where it is common to see people leave dogs in vehicles (usually visitors to an district) - i.e. areas where dogs are banned, from city centres to beaches perhaps there should be signs about the risks of leaving pets in vehicles and directions to the nearest place where they are allowed out.

Proposal 9

Dogs - secured on moving vehicles

Replace the words "in a way" with "by chain or wire rope or in an anchored box or crate" after secured

Rope, leather braided leads can easily be chewed through, a dog box or crate should be secured to the vehicle.

Again my personal opinion is that animals travelling inside the cab of a car/vehicle should also be secured just as people are to prevent injuries in the event of a sudden stop or from jumping out the open window of a moving vehicle or escaping following an accident.

I'm not sure how this is going to be enforced given that a *555 call doesn't even get much of response and a working dog standing on an atv on a back of a vehicle driving through town hardly elicits a raised eyebrow.

Proposal 10

Drowning Dogs and Cats

Agree but why just restrict it to the deliberate drowning of cats and dogs - what about other pets/animals?

Signage should be placed wherever pet food is sold so that there is no excuse for non-awareness.

There was a reported sighting on facebook of a person drowning pups in the Ngunguru river about three weeks before submissions closed and the people that saw him managed to save one of the pups but did not have enough details to identify the person or the vehicle that he was driving. I understand that this was reported to the police. I would say drowning would be a difficult offence to prove and I have reservations about whether there would be an increase in prosecutions but I do believe where there is a case that can be proved it should lead to a criminal conviction.

Proposal 12

Crabs, rock lobster and crayfish

The proposal does not specify that it is for commercial operators and to be honest - who knew that the Animal Welfare Act extended to crustaceans?

I can see the penalties applying for commercial operators but really the way the proposal is written if I'm lucky enough to capture a legally sized crayfish or crab and drop it into a pot of boiling water I'm liable for a \$5000 fine whereas if I leave a collar on a growing puppy and it causes major damage to the neck I'm only liable for a \$300 fine. Something inequitable here.

As it has been many years since I have dived for crayfish I was unaware that they had to be chilled before killing until now. Perhaps more education about the human treatment of fish animal should be displayed at marinas, boat launching facilities, beaches for recreational fisher people.

There should be a two tier system for penalties - for commercial fishing operators the prosecutable regulation offence, for others an infringement offence.

Proposal 31

Agree with proposal

We have never used this method of stimulating let-down and as it is not really a topic that is discussed amongst local farmers so we do not know anyone doing this. Interestingly we had a high school student on farm earlier in the year and she had learned of this method at school and asked if we used it. So obviously the practice is not as obsolete as we thought.

Proposal 32

Vehicular traction in calving and lambing

While it is quite common to tie off a calving rope to a stationary vehicle as an anchor point, I have only seen it a moving vehicle used once in nearly 20 years on a dairy farm. In that instance neither the farm manager or vet could get the calf out using a calving jack. The farm owner refused to pay for a caesarian and the vet was reluctant to kill the calf in utero and cut him out, the other option being to shoot the heifer. The vehicle was used under veterinary instructions. Yes both survived although the heifer was down for a couple of days afterwards.

I guess I'm saying that from my (only) experience this is rare and resulted in 2 lives being saved.

Proposal 33

Ingrowing horns

Peer pressure is working effectively in this area via farm discussion groups etc but further education is required as many are unaware that the (few) dairy stock that they may have on farm should have these horns cut back at least two weeks before trucking. Many of the stock arriving at the works now are probably from farmers that don't want the hassle of dehorning and are sending them as culls. When you are on a dairy farm and looking at the back end of a cow a lot you don't always notice horn regrowth until it becomes quite obvious. I'm not sure that an infringement fine is warranted, unless there are repeated offences from the same farm.

By the time the horn is touching it should have been noticed although I have to say it is easier to see those horns that stick out rather than the ones that curve along the head.

Proposal 34

Stock transport - cuts and abrasions

Proposal 35

Stock transport - animals with ingrown horns

The issue here is that the animal needs to be culled. Getting a certificate from the vet is expensive and no guarantee that the animal will be accepted at the works by the vet there and it ends up down the chute. The farmers is then out of pocket more than if he shot the animal. I think really that this is already covered pretty much by proposal 33.

Proposal 36

Animals with bleeding horns/antlers

The current code is far clearer on this than the proposal. Would better education with deer producers around cartage or transport operators refusing to load stock with bleeding horns/antlers not be an option?

Proposal 37

Transporting animals with long horns or antlers

I think this is fair, but again the current code has a far better explanation of expectations

Proposal 38 and 39

Transporting lame stock - both these proposals are similar and could easily be incorporated into one.

Again, getting a certificate from the vet is expensive and no guarantee that the animal will be accepted at the works by the vet there and it ends up down the chute. I would envisage more animals being shot on farm.

Currently we use the advice of the stock buyer if there are animals we are unsure whether they will accept a particular lame animal. Our farm owner has already indicated as there is no way of transporting the lame animal off the milking platform to the runoff block - to rear calves/recover - without contravening this proposal, then the animal will probably be shot. Probably a decision to shoot would be made earlier now than treating in the case of hip injuries via calving or mating.

Proposal 40

Transporting pregnant stock to slaughter

If you have unrecorded mating it is not always possible to tell when an animal will give birth. Some cows will bag up and calve in a few short hours. Will an animal that slips during transport, or immediately after, as a result of the stress of transport - has a premature birth will this also be an infringement?

Proposal 41

Transporting animals with diseased udders

If the udder is as bad as described in the proposal then the farmer has two options - treat or cull. With treating there is a milk and meat withholding period. If the cow is already on the cull list is she better to end up in the food chain or be shot on the spot? While a dairy (cow or goat) farmer can strip out a cow as much as possible each day sometimes the infection will get worse before transport can be arranged. If you factor in the cost of a veterinary certificate or the possibility of an infringement fine then again our farm owner has indicated the cow would likely be shot.

Young Calf Management /regulatory Proposals

On every farm we have been on, young calves have been fed immediately there is warm colostrum available - so at am/pm milking times. Calving is an extremely busy time on farm and quite frankly it is rare that anyone is around the calf sheds at the times calves are picked up. Daily pick up times also seem to vary depending on how many calves are picked up at farms prior to yours. The number of calves available for pick up may vary from day to day - 1 or 2 one day, over 20 the next. Asking farmers to feed bobbies within two hours of

transport as was suggested at your public meetings is just not practical when it is likely that all farm staff are engaged in a myriad of other farm tasks at this incredibly busy time of year. If you used the declaration - who would be signing it. As farm employees we get no say in who calves are supplied to and, as in the case of many modern farms, the owner of the farm and/or the stock, may live somewhere else entirely. If the owner of the animals signs and the employee doesn't comply then who is liable?

Proposal 43

Loading and unloading young calves

I would like to know the percentage of farmers that have the physical space and the funds to put in a ramp. It is not going to prevent lifting of the calves as the ramp would only go to the first deck and calves are generally double decked. Also many of the transport operators that have picked up calves from us, use small trucks to do the farm pick up and then at the depot transfer the calves to bigger trucks to transport to the slaughter facility so calves are still going to be lifted and handled.

For ourselves, again after discussion with the farm owner, we have been told at the current payment level it is not really economic financially but of course better ethically and environmentally to sell bobby calves. Add on the cost of a ramp and a facility to hold the calves, as currently they are picked up from their rearing pen and there is no practical way to add a ramp there, and the hassle of extra staff time to pick up and transport the calves to this new pick up point, it is better to shoot the calves not wanted for rearing.

According to the figures that were shown at the meeting, 0.25% of 2.2 million calves are killed as a result of transport injuries so roughly 5500 calves. With 5 million dairy cows and 1 million reared for replacements and natural deaths/slinks and bull beef sales accounting for perhaps another 10- 15% and some off to pet food there are an awfully large number of "missing" calves and I would guess that this number will increase. That is an incredible waste of calves and possibly more harmful to the industry if this was generally known than a tiny percentage of recorded transport deaths.

While I agree that the health and safety of the truck drivers may decrease slightly if they do not have to lift the calves initially at the farm, but by the same token it will not decrease the overall number of times that calves are lifted on our farm as we, the farm staff, would need to pick them up and put them in a trailer and move them to a special loading facility. The only way I could see a ramp working where we are would be if there was a ramp lowered from a truck and that would mean altering the gates on the pens somehow to allow the ramp but the calf not to shoot around it and out. Currently the bobby calf truck backs right up to the gate pen at an angle allowing a small space for the gate to be opened enough to allow a person to walk through into the pen and walk or carry the calf to the gate and lift it up.

Why is there not a way of making the current minimum standards enforceable rather than compelling farmers to outlay capital funds that many will probably not be able to afford on something that will, in reality, be merely window dressing. Why not have transport operators

install video cameras at the back of their truck/trailer units, such as the ones they have in taxis but with a wide angle lens, so that allegations of mistreatment at loading/unloading can be easily proven/disproven, with an infringement for each pickup not filmed. You should also be able to see the calves running around their pen as drivers try to catch them so is it really necessary to have a ramp - which even most stock balk at walking up (which is why drivers have prodders) - to prove that a calf can walk?

Given the current milk payout even 24 months would be too soon to implement this if it was to be passed, so in the interim years until (if) it did become financially viable I would expect to see a substantial drop in bobby calf kill numbers.

Proposal 44

Shelter for calves

Currently and for the past 16 years at least and on a number of different farms during that period, bobby calves have always been picked up directly from their allocated rearing pen(s) by the transporters. These pens are big enough for calves to not only lie down but also walk around or kick unfortunate farm staff who are trying to feed them. When there are a lot of bobby calves with only some old enough to transport we generally block the front pen area off with a divider gate but there is always easily enough room for each calf to lie down after breakfast to wait their journey. If we have to build a ramp, it would mean we would need to build an entirely new shed with a ramp in order to provide shelter prior to transportation as there is not enough space to build a ramp at the current shed and still have sufficient room for farm vehicles, stock trucks and the milk tanker to drive passed. Huge capital outlay for something that is used for only a couple of months when we already have perfectly sound shelter but that we can't get a ramp onto, and a set of yards with a ramp already but without the shelter requirements of the proposal.

To be honest, the current codes seem to already cover this area really well. Farmer pressure has already made bobby calf pens at the side of the road obsolete - well in areas we have farmed anyway so why not just ban roadside pick up of calves in those old fashioned bobby calf pens.

Proposal 45

Calves not to be transported before 4 days of age

I actually thought this was already the rule as per the transport code. Same with walking and having dry navels (unless they have been sucked). I am not happy re suggestion of the four days post separation from the mother. When our pens are full or we have health issues in the calf shed and the collections are not daily or we have health issues in the calf shed we leave the calves on their mother in the paddock and (share) milk mum until there is space available in the shed or the calf is 4 days old. Any increase in 4 days is likely to add huge stresses to the worker(s) that feed an increasing number of calves while trying to minimise the risk of scours with close supervision of intakes as well as the capital outlay required to provide shelter/housing for the extra calves for a short period of time each year. Again,

unless there were huge increases in the bobby calf returns then these calves are unlikely to survive much longer than birth.

Recording the calves would be an issue - how do you record bobbies? If you have a recorded dairy herd, yes you write/enter in the cow number, sex of calf, date of birth, an unrecorded herd, well nothing is recorded but either way, if it is a bobby calf there is no record/tag kept on the calf. I guess most people put a paint mark on their bobbies to identify which ones were brought in on "Tuesday" while rearer calves get their Nait and ID tags.

To compare the NZ system with the european situation where there is a vastly different calving pattern and where herd numbers average 12% of the average NZ herd size is crazy. Their herds are kept indoors for a substantial portion of each year so they already have the facilities to keep a few calves for 10 days. Here in NZ a lot of farms would be bringing in the as many freshly calved cows and calves in one or two days as the equivalent of their entire herd calving in the same time span. The systems are entirely different and comparisons between them make no sense.

I have nothing against the minimum age being 4 days as per the proposal but can see huge issues in trying to prove the calf is or isn't of age given that there is no way to identify which bobby was born when except by DNA tests and only then if the calving was actually recorded. The physical characteristics as described in proposal 46 would be a better criteria for determining a calf that is fit for transportation in conjunction with the generally accepted 4 day age than a straight regulation on age alone.

Proposal 46

Calves - fitness for transport

Agree with this except - calves can be 4 days of age or older but if there is a sucker in the pen sucking on their navels the cord will not be wrinkled and withered looking, they will look pink and fleshy. Hooves is a better way of telling

Proposal 47

Maximum Time off feed

Agree - as said before, bobby calves are fed as soon as fresh warm colostrum is available from milking, any restriction on a maximum feeding time limit before been picked up off the farm will not be tolerated well by farm staff.

:Proposal 48

Calves - maximum transport time

When is the transport time calculated from? Living in the Waikato we have been fortunate to be fairly close to a bobby calf processing facility, so actual transport time is not huge, but then adding in time from pick up, travelling around to other farms for their calves, reloading

them into larger truck for transport to facility, I'm guessing this probably equates to a longer length of time that I've ever really had to think about. Eight hours does seem reasonable but I think this is a question of "doability" for the transporters.

Proposal 49

Blunt force trauma

I will say at the outset I dislike this process and personally am not capable of this, however there are others on the farm that are and in the case where it is needed it is quicker for them to give the calf a quick blow than have to return to where ever the gun safe is and fetch a gun and ammunition. (Note here that on the farm we are on it can be over a 20 minute journey on farm races to return with a gun, is 20 minutes extra of suffering justified?). On our farm we are lucky to have firearms licence holders but on speaking with members of the local gun club I was quite surprised to hear that there are quite a few that have been called out by farmers to shoot injured stock as there are no firearms on the property. Using blunt force is not a regular occurrence and again a practice that seems to be one that is only used in urgent situations so I would prefer to see the status quo on this. There is enough peer pressure and after the publicity last year more awareness that it is to be used in emergency situation only.

Proposal 50

Transport across Cook Strait

Not something I have thought of but if there is an event that makes transporting calves for processing across the strait quicker and easier than the next alternative processing facility on the same island, then yes they should be transported.

Proposal 58

Freeze branding dogs

My understanding from the pig dog people is that they have people that are experienced at this and I would guess it is a procedure that not many veterinarians have performed. So from my perspective if I had to have a dog branded, I'd prefer to go to someone that has experience and knows how long to apply the iron without causing a lot of pain than a vet that might give copious amount of pain relief but not perform the task as quickly or with as much skill. I understand that the pig dog association have advised their members that having a vet present when it is performed may be a way forward, so perhaps the proposal can be amended to reflect this, although I'd prefer to see the status quo.

Proposal 59

Debarking dogs

If the procedure is performed as there is no way of curbing the dog's enthusiasm for barking and every training method has failed and the neighbour is complaining than yes, debark the dog. A debarked dog still "barks", actually I find it an annoying sound too but I think the real issue is convincing the veterinarian that this is a life/death situation for the dog and the procedure needs to be performed. So here we have a catch 22 situation, debarking needs to be performed by a vet and vets don't want to debark.

Proposal 60

Dog ear cropping

Agree with this. It should be able to be proved from importation documentation that dogs with cropped ears were imported with them already done.

Proposal 61

Dew Claws

From your minutes

Dogs - Front dew claw removal in dogs, articulated back dew claw removal - Borderline important/unimportant, but practical and feasible - Must be performed by a vet or vet student under supervision. - Must only be performed for therapeutic reasons - Must use pain relief at the time of the procedure. No issue for dairy and beef farms – uncommon if at all. Some sheep dogs maybe – use sidecutters, more of an issue for hunting dogs.

We are on a dairy farm, we purchase working dogs, usually headers and just recently a huntaway pup, all have had dewclaws removed. This is contrary to the conclusion in your minutes.

I occasionally breed puppies and dew claw removal is a quick procedure which involves no cutting through any bone. Unlike many of the videos on dewclaw removal we have one person hold the puppy in the hand with the legs hanging down while the second person quickly cuts them out, there is no cutting of bone and the procedure takes just seconds. As the nervous system is not fully developed at birth pain relief is not required, it's the turning the pup upside down in some of the videos that causes them to squirm and squeak as they try to right themselves.

As an owner of German Shorthaired Pointers that primarily hunts in forestry blocks, dew claws left on are a hazard in New Zealand. Unlike many other countries in the world when our forests are trimmed or thinned the cuttings do not get taken away and are left to rot back down. I have hunted with someone that had an imported dog that still had dewclaws

and she ripped one badly when negotiating her way (read going at warp 9 normal german shorthaired pointer speed). Massive injury, massive vet bill, long recovery time for something that could have been prevented in less than a minute as a newborn. Seeing how much pain Emma was in pretty much resolved my mind that any pups that I am responsible for breeding would have them removed.

The first problem is that not all dew claws are the same, while some lie pretty close to the body - and these can be an issue if they are not regularly trimmed as they can curl around and dig back into the leg, others lie close but are not an issue and then you have the ones that stick out and can easily be torn. At the age a pup has the dew claws removed it's not really possible to tell which sort he or she is going to have. The second problem we have as dog owners is that NZVA don't want dew claw removal, so by making it a vet only procedure you are effectively banning it. There is no requirement in the breed standard (except that there should be no rear dew claws) that front dewclaws be present or not, we take them off as a preventative measure. Just as we put our seatbelts on each time we get into the car to help minimise injury in the event of an accident.

There are probably hundreds (if not more) of non veterinarians/veterinary students in New Zealand that are experienced at dew claw removal that routinely remove them from pups at birth, I doubt there would be that many if it was something that caused a much wanted pup an injury or if they had to hack through bone to perform it.

The proposal should be amended to read:

Front limb dew claw removal and articulated (jointed) hind limb dew claw removal **on dogs four days of age or older:**

Proposal 62

Dog tail docking

There is something very wrong with the lack of fairness in these proposals. If all the proposals were put in place as is, I could, without any skill or training dock a lamb's tail with a hot iron, file piglets teeth and cut their tails off, disbud a calf or put a ring on the private parts of a ram lamb or bull calf up to six months of age, spike a crayfish or a snapper in the head - all procedures where there is evidence of pain, yet I can't use an approved tail bander (because there is no surgery involved in putting a band on) to dock my neonate pup which does not have a fully developed nervous system? This does not seem right to me. All these procedures are performed to prevent future injury - well with the calves it's as much to prevent injuries to humans as each other - yet one procedure, acknowledged to be the least painful (if any pain at all) is held at a higher standard than the others?

Again with my own German Shorthaired Pointers (GSP's) they are docked to prevent injury. The other gundogs in this household, labrador and lagotto are not docked as each have a more heavily coated tail and the build of the tail is far more substantial than that on the GSP's and their tail action is completely different. When the tails on my pups are docked I get just just under 60% of the tail left on, this is about the point where the tail starts to get

really thin in and whippy. Other than the spaniels, it is mostly the european breeds of gundogs that are docked. These breeds are also known as HPR - hunt point retrieve for the work they do where the retriever and spaniel breeds hunt and retrieve, and the english pointers hunt and point. Most of these european breeds have inadequate coat coverage on their tails to hunt in the marginal areas that birds like to hide, heavy cover including those with dead/fallen trees, blackberry, hawthorn, matagouri anywhere a tail moving at warp speed is in danger in coming in contact with something. The long haired varieties of these european breeds are not traditionally docked as they do have cover on their tails.

Interestingly in Australia, since the ban came into force there, GSP's have suffered from limber tail which is quite painful and requires anti inflammatory medication - not so great on a dog's liver. Hunting tail injuries in GSP's over there are rarer as they are not supposed to hunt deer with them and the bird hunting terrain in the big open fields they have there is quite different to the usual New Zealand terrain. Going by the photos we see of the Australian GSPs, quite a few of them have had their tails "tipped" - the soft ends removed regardless of the ban.

The GSP tail rotates until it is a blur when on a hot scent, the point does not come in and the tail does not freeze in position until the bird is holding in one spot or not at all if commanded to retrieve a previously wounded bird. The closest you could liken this tail action to is that of a helicopter rotor. The lagotto and the labrador just wag their tail, yes a little faster but it's still a wag not a high speed blurry event. The Scottish parliament are currently wrangling with proposals to overturn their blanket ban on tail docking and allow the docking on working gundogs. I have attached a link to a video prepared by scottish gamekeepers showing tail injuries sustained since the tail ban was introduced. There is a GSP in there - it's the solid black one but ofcourse in the UK and Scotland the gamekeepers breeds of choice are the spaniels - springer or cocker mainly and a few clumbers, and the retrievers - like the labrador which again have a completely different tail action.

<https://www.facebook.com/taildocking/videos/1723342981229187/>



I have lots of photos of injured tails but have decided not to post them in my submission as I think you will see a lot of similar pictures in the video. I spoke with one owner who has had to have her spaniel tail amputated (pictured) three times. Personally I would have found a vet that would amputate to the traditional docked length the first time but hers refused and only took off the damaged area each time.

I do think it would have been far better to have taken this tail off at a couple of days old than to put this dog

through three major surgery and the trauma both from the original injuries each time and the recovery periods afterwards.

Currently tail banders are only allowed to dock pups that are eligible for NZKC registration and as the NZVA code of ethics more or less bans veterinarians from docking tails then the only docked tails since the Code came into force should be either imports or by a tail bander. There is paperwork that is completed for each puppy that it docked so it should be relatively easy to ascertain which dogs have been docked legally. Again I infer from the minutes from your workshops that banning tail docking is not an area of universal agreement.

So again I would like to see this proposal amended to read.

For dog four days old and older tail docking must be performed by a veterinarian or veterinary student under the direct supervision etc

Proposal 64

Cattle claw removal

Wow, new one on us. Know absolutely nothing about this.

Proposal 65

Teat occlusion

Never heard of anyone doing this on a cow permanently, just end of season teat sealing. If a teat is not to be milked we use leg bands to indicate this.

Proposal 66

Cattle tail docking

I'm not sure what report said that tail docking does not improve cow hygiene but those researchers needed to come into our milking shed! At the outset I will say that we do not usually dock cow tails, any tails in the herd that are docked have come from other farms, have self docked due to poor eating habits just before hot sunny days and I think there is one cow that had a band put on her switch as it was a case of lose the worker, shoot the cow, or do something about tail.

We do trim tails but we don't use the electric trimmer that your people at the meeting were so excited about. I asked when I got home, yes we have one, no it's not used as 1) there are OSH implications using a drill that is powerful enough to drive it by staff that are already susceptible to soft tissue injury due to the repetitive nature of milking. 2) the cows in the video had clean dry tails. At the time of year we want to be trimming tails the nutrient levels in grass vary widely and the output from just under the tail and all over the switch is generally very wet and liquid. 3) At the time of the year when the grass is not so wet and the

tails are cleaner and dry is when they need the switch for fending off the flies. 4) still takes the same amount of time to do as trimming with a knife or clippers as there is still only the same amount of time between cups on and cups off between rows. The downside to using a knife or clippers is that some tail will inevitably get cut or nicked.

The argument that internationally cows are no longer docked does not wash. In nearly all the places listed in the proposal document, the cows are kept indoors for significant periods of time - some all year round. These cows are their feed intakes closely monitored and balanced, they are not relying on the weather and what is growing on their pastures as in our grass based feed systems. Being indoors means that they are less bothered by flies. This means the output is more solid and so the tails are kept cleaner and the need to dock - well there really isn't one.

Again I say we do not usually dock but I can't tell you there are many many times I wish that some of the cows are docked, so I advocating the right to choose. It is extremely unpleasant to have a shitty, pissy tail smacked across your face, not to mention potential health issues if your mouth or eyes are open. We have always trimmed tails as cows move from the colostrum herd to the milking herd - it works as an additional identifier if one of the herds breaks into the other, so milking the colostrum herd is always an unpleasant task.

I think the current code should remain as is!

Proposal 67

Castration of cattle

I was under the impression that there were skilled people who did this - non vets - on older cattle?? If so then I think an allowance should be made for these people to continue.

Again, nice to see I can put a rubber ring on a bull calf that could weigh up to 180kgs (no I'm not willing to give this a go) as long as he is less than 6 months old but can't put one on a 3 day old puppy.

Generally if we rear bull calves they are gone after weaning, if we keep a steer for meat then he is usually introduced to the rubber ring at weaning if he was missed at the time of disbudding.

Proposal 68

Disbudding

Change "must" to "should" re the use of pain relief.

We used to have contractors come in to disbud but as part of cost cutting the farm owner now has his own equipment but does not use pain relief. We are required to assist him.

How is anyone to know that pain relief is not used? Other than a quick shake of the head afterwards, most calves don't seem to react, so is it really a necessary expense?.

To us disbudding is the little bumps when they grow and are sharp little pointy things, that's dehorning. Probably a length would be appropriate way to provide a distinction between the two.

Proposal 69

Dehorning

Usually the vet comes in jabs the animal on each side of the head and watches while staff saw the horn off. This is done in late autumn when flies are less likely to be around and the cow is not being walked to the shed for milking each day. Generally these are regrowths but given the new proposals re transporting with horns it is likely they will have to removed at the grazing block prior to transport back to the farm, as the calves go off farm after weaning.

Proposal 70

Sheep tail docking

Again - are there not people now who dock older ones as part of their livelihood (non vets?) Other than that the proposal appears sound for someone that only deals with a few lambs each year that are raised for calf club.

I think the term "must not be cut flush" is very clear, have no idea what the normal age for docking is but we try to have the rings on at least a month before calf club day.

Proposal 71

Mulesing

I thought this was on the way out due to peer pressure.

Out of Scope

From: Christine Rotzel <§ 9(2)(a)>
Sent: Friday, 28 September 2012 10:46 a.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Act Review
Attachments: Animal Welfare Act review.pdf

My submission for the review of the act is attached

Christine Rötzel

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The information contained in this message is confidential and privileged. It is intended solely for the use of the intended addressee(s). The unauthorised use of the information may result in liability for breach of confidentiality or privilege. If you have received this message in error, please notify the sender immediately by reply e-mail or call the phone number above and delete the message and any attached information or files.

Christine Rötzel

s 9(2)(a)

Animal Welfare Strategy and Legislation Review
Ministry for Primary Industries
P O Box 2526
Wellington 6140

Proposals for a New Zealand Animal Welfare Strategy and Amendments to the Animal Welfare Act 1999.

My name is Christine Rötzel and I have hunted, bred and exhibited German Shorthaired Dogs (GSP's) for 25 years. This breed has been traditionally docked since the inception of the breed in the late 19th century. I am a member of the New Zealand Council of Docked Breeds, the New Zealand Kennel Club, Continental Gundog Club, NZ Versatile Hunting Dog Testing Association and the Auckland & Regions German Shorthaired Pointer Club.

I support the New Zealand Council of Docked Breeds and the New Zealand Kennel Club in their Submissions.

I also wish to have my Submission considered for the proposed Strategy and possible Amendments to the Animal Welfare Act 1999 and make my submission on the following Issues.

The timing coincides neatly with rearing lambs and calves for calf club and therefore some of the dehorning/tail banding/wething issues are very fresh in my mind.

Issues 1 & 2 NZ Animal Welfare Strategy and Standards for care

I am not happy with the proposal to change codes to regulations. Clarify the codes by all means, but regulations are far too easy to change without full consultation with all the stakeholders. Increasing education in animal welfare and penalties for non compliance is a good thing, but I firmly believe that peer pressure from others (clubs and organisations) will improve the current minimal standards in some areas far more effectively than compulsion by a government body.

Issue 4 National Animal Welfare Advisory Group

I agree there should be a group, however I am not happy with the current makeup of the group and also the huge lack of information they have produced for the Animal Welfare Act Review. Despite knowing this was coming and the timing guidelines that this group gave on their website, I was unable to find out about the various consultation meetings or even when submissions would be called for. It was only by checking the website weekly I was able to find that submissions had been called for. Also, for animal welfare issues, this time of the year is incredibly busy by many who work with animals with lambing, calving, foaling and little time available to prepare submissions on issues which may have a huge impact on farming operations.

I would like to see more representation from other bodies on this advisory group, including more representation of small animal interest groups, as well as those with more exotic animal species. I do have an issue with NZVA having a seat but other "specialist" animal health providers not represented.

Issue 5

I would like to think that live animal exports will continue but that any changes contemplated will strike a balance between the cost effectiveness of any further regulations or standards to be met and meeting the demand for humane treatment – any transgression of which, our media will surely whip up a frenzy about. I think you need to keep to "what a reasonable person would expect".

Issue 6. Significant surgical procedures

I do NOT agree with the proposals to change who can perform significant surgical procedures. The reasons for this are varied and dependant on the procedure and the type of animal. The main reason is that I believe that there are people who are trained, either formally or "on the job" to become specialists in that one specific area of animal health/treatment. This includes persons accredited to perform tail banding on dogs, gelding, horse dentistry, dehorning, embryo and scanning work etc. In many instances these non vets are significantly more skilled in that one area than a general practice veterinarian.

To copy from the Federated farmers survey

Who should be able to carry out certain surgical procedures?

The key for the following table is:

A. Not significant: Can be carried out by anyone

B. Significant: May only be carried out by a veterinarian or a person who is acting under the direct supervision of a veterinarian and is being taught veterinary science at a undergraduate level

C. Restricted: For significant surgical procedures, they may only be carried out if the procedure is in the animal's interests and using appropriate pain relief

D. Controlled: For significant surgical procedures, they may also be carried out by the owner of an animal, or their employee with written veterinary approval.

E. Prohibited: No one may carry out the procedure.

Procedure	Level of control
Mulesing	restricted
Tail docking of horses	restricted
Laparoscopic artificial insemination of sheep & goats	controlled
Surgical embryo collection in sheep & deer	controlled
Tail docking of dogs	controlled
Tail shortening of cows	Not significant
De-sexing of companion animals	significant
De-sexing of horses, llamas & alpacas	controlled
Tooth extraction in horses and companion animals	controlled
Liver biopsy	controlled
Removal of dew claws in dogs	Not significant
Caslick's procedure (surgery to vulva of horses)	controlled
Dubbing (removal of comb from poultry)	controlled
Surgical castration of livestock on farm within certain age limits and under certain conditions	controlled

Tail shortening of cows

Having spent several years milking cows I can understand why this is required for some (as in a very few) animals. We have always preferred to trim the brush of a cow's tail but there are just some cows, due to their individual conformation, where this is just not enough and there are significant health risk issues for a milker. I disagree with surgically shortening these tails but shortening by 2 or 3 vertebrae by the use of a rubberband should not require the exorbitant cost of summoning a vet to put it on. We don't use vets for banding our lamb tails and docking a cow's tail is not dissimilar..

Tail Docking of dogs

I believe that that the Banding of Dogs Tails should continued to be considered a Controlled Procedure and that only person who are members of an accredited Banding Scheme are permitted to band dogs.

The reasons for this are as follows

While my personal preference has always been to have had my vet surgically dock the tails on any pups I breed, the restriction on this procedure means I must now band using an accredited tail docker from the NZKC scheme. Massey University has not trained vets to dock neonatal pups for over 20 years and their own pressure (ban) against members of their association to dock, means that any move to make this a restricted or significant procedure will effectively mean that dogs in this country will no longer be docked.

For my own breed, GSP's are docked due to the thin skin covering their tail. The tail action when on a hot scent trail is like that of a helicopter rotor, with blurring at the speed the tail is working. At this speed the tail is easily damaged in the cover that most hunters in NZ work their dogs in. In Australia, even where hunting is banned in many states, there have been significant injuries to tails occurring in GSP's, since the procedure was banned there. The NZ Council of Docked Breeds has already put in a submission that covers greater information on the hows of tail docking and I fully support their submission but do not want to repeat all their submission data here.

Removal of Dewclaws in Dogs

Again the removal of dewclaws is necessary for the wellbeing of my GSP's. Where we get permits to hunt in forestry there are always thinnings on the ground and having hunted with an imported GSP that did not have dewclaws removed and where they caught and tore as the dog ranged through the forest, I think that for a few seconds procedure at birth or a couple of days afterwards certainly saves major surgery and recuperation as an older dog. As with docking the tails, at this early age the pups do not even notice the procedure if they are handled correctly. This procedure can be easily taught and mastered although personally I have usually had a vet perform it at the same time as a neo natal check-up for both bitch and pup.

I have talked with dog breeders of other breeds and can also understand the concerns of those that have a breed where the eyes protrude, with huge probabilities of eye damage from a dog's own dew claw. We also have the farm dogs – most of which have had the dewclaws removed by their breeder before we bought them, but my daughter has a lagotto which traditionally has the dewclaws left on (curly coated breed so some protection for the dew claws) and it has been an education process to remember to keep her dewclaws clipped before they grow long enough to curl back into her leg.

Desexing of companion animals

I think that this should be a significant procedure for most companion animals. What I do not agree with is the early desexing of these animals. While I fully understand why a breeder would desex before sale, I do not think it is in the animal's best health interests to have this procedure performed before the growth plates close. While the desexing prevents the animal from reproducing it can also have significant adverse health impacts. I think a

minimum age for desexing is an area that needs to be explored, unfortunately both the NZVZ and the SPCA who are represented on the Advisory Group have a vested interest in the early desexing practice to continue.

Issue 7 Reporting of Animal killed for research

Prima facie I agree that this should be reported upon. I am not sure that an Animal ethics committee is the way to go so agree with the proposed exemptions.

Issue 8 Enforcement

I am in two minds over this. Having been horrified at the conduct and the attitude of some animal welfare officers in reality TV shows I think that giving them the power to issue instant fines could be a dangerous thing. Where is the opportunity for the alleged offender to defend him or herself?

Where there are defined minimum codes then I don't think it unreasonable for inspectors to issue compliance orders.

Issue 9 Other proposed offences

Drowning a land animal

Yes, absolutely an offence

Ill treatment of an animal in a wild state.

Wow, this would have to be carefully defined. What one person regards as wilful and reckless ill-treatment might not be so to another person. Is wounding a deer while out deerstalking and then not being able to find it reckless ill treatment? Certainly in Europe hunters must have tracking dogs available to avoid just this scenario as it is an offence there. I know the commentary says that hunting and fishing will not be affected but I think there are persons that will try to take any regulation way beyond its intent. It is an area that will need clearly and carefully worded.

I am happy to speak to my submission if required

Yours sincerely

Christine Rötzel

s 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 history¹. 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 welfare². 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> <p>a. the species and size of an animal</p>

		<p>b. the manner of use of an animal (circus)</p> <p>c. the location of the animal (slaughter premises)</p> <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 loading¹, only one individual was prosecuted in relation to the footage², 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) http://safe.org.nz/nz-dairy-industry-exposed</p> <p>2) https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</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 <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 <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
		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 animals¹ 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 met¹.</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	<p>Housing and equipment design</p> <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 fully¹. 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 hens². Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes³) if they want to lay at the same time. 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"> • Sufficient length of perching space to allow all birds to perch at the same time; and • Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night. <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'⁴.</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 hens⁴. 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
		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^{0.67} (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. 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)¹ 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 ADFI².</p>

	<p>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?</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 pen³ 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"</p> <p>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. 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. 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>
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		http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&context=kaesr Ibid. Page 9 "ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016 < https://www.mpi.govt.nz/document-vault/1446 >
26	Pigs	Dry sow stalls
		Proposal: I support the prohibition of dry sow stalls Penalty: I support the proposed infringement penalty of a prosecutable regulation offence.
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 NAWAC¹. 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^{2,3}.</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 http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf</p> <p>Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</p> <p>KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. http://www.sciencedirect.com/science/article/pii/S0167587711003564</p>
28	Pigs	Provision of nesting material
		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

		<p>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 sawdust¹</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. http://www.ncbi.nlm.nih.gov/pubmed/20889685</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
		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 loading¹, only one individual was prosecuted in relation to the footage², 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>http://safe.org.nz/nz-dairy-industry-exposed</p> <p>https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</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 loading¹. 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>http://safe.org.nz/nz-dairy-industry-exposed</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 calves¹. 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 age¹ 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 paper¹ does not demonstrate that:</p> <p>this is in fact the case in calves <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 study²</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 calves¹ 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 >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:</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</p> <p>pain relief is required for any supernumerary teat removal procedure regardless of age</p> <p>ii) infringement penalty of prosecution</p> <p> procedure is performed using sterilised equipment</p> <p>iii) infringement penalty of \$500</p> <p>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
		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.</p> <p>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 > 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 < 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.</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
		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

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 history¹. 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 welfare². 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"> 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).
		<p>Despite footage from 2015 clearly showing several different people throwing young calves during loading¹, only one individual was prosecuted in relation to the footage², 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) http://safe.org.nz/nz-dairy-industry-exposed 2) https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</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 <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 <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 animals¹ 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</p>

		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 . 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 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 ¹ . 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>Research has shown that some hens in colony cages can be prevented from using the nest provided due to competition from other hens². Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes³) if they want to lay at the same time. 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"> • Sufficient length of perching space to allow all birds to perch at the same time; and • Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night. <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'⁴.</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 hens⁴. 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
		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^{0.67} (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. 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)¹ 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 ADFI². 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 pen³ 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</p>

		<p>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.</p> <p>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\squarevalue 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\squarelitter 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\squarelitter 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\squareSalaun, R. B. Morrison, H. Spoolder, P. L. Sundberg, and A. K. Johnson. 2006. Application of broken\squareline analysis to assess floor space requirements of nursery and grower\squarefinisher pigs expressed on an allometric basis. J. Anim. Sci. 84: 229\square235.</p> <p>Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015.</p> <p>http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&context=kaesrr</p> <p>ibid. Page 9</p> <p>"ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT."</p> <p>2015. 15 May. 2016 <https://www.mpi.govt.nz/document/vault/1446></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\squareoptimal. Continuing a production system which</p>

		<p>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 NAWAC¹. 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^{2,3}.</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 http://www.nzpork.co.nz/images/custom/farrowing□crate□advice□14□march□2016.pdf</p> <p>Weber, R. "Piglet mortality on farms using farrowing systems ... □ IngentaConnect." 2007. http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042</p> <p>KilBride, AL. "A cohort study of preweaning piglet mortality and ... □ ScienceDirect." 2012. http://www.sciencedirect.com/science/article/pii/S0167587711003564</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 sawdust¹</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. http://www.ncbi.nlm.nih.gov/pubmed/20889685</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).
		Despite footage from 2015 clearly showing several different people throwing young calves during loading ¹ , only one individual was prosecuted in relation to the footage ² , 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. http://safe.org.nz/nz-dairy-industry-exposed https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-

		charges-in-bobby-calf-investigation/
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 loading¹. 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>http://safe.org.nz/nz-dairy-industry-exposed</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 calves¹. 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 age¹ 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
		<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 paper¹ does not demonstrate that:</p> <p>this is in fact the case in calves <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 study²</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	Duration of transport

	Calves	
		<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 calves¹ 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
		<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
		<p>I support the prohibition of hot branding and the penalty of prosecution.</p>
52	All animals	Embryo collection via exteriorised uterus (surgical embryo transfer)
		<p>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).</p>
53	All animals	Laparoscopic artificial insemination (laparoscopic AI)
		<p>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</p>

		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 >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:</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</p> <p>pain relief is required for any supernumerary teat removal procedure regardless of age</p> <p>ii) infringement penalty of prosecution</p> <p>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
		<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
		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.</p> <p>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 > 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 < 2 months of age. I propose a</p>

		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	Develvetting
		I support the proposal for develvetting 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

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 history¹. 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 welfare². 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"> 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) <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 loading¹, only one individual was prosecuted in relation to the footage², 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> <ul style="list-style-type: none"> 1) http://safe.org.nz/nz-dairy-industry-exposed 2) https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/
4	Dogs	Pinch and Prong collars
		<p>I support the prohibition of pinch and prong collars under any circumstances; no exemption for dogs used for special purposes</p>

		(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

		<p>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 <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 <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
		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

		<p>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 animals¹ 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 met¹.</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 fully¹. 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 hens². Also, the limited space in colony cages is insufficient to allow hens sufficient time (on average 45 minutes³) if they want to lay at the same time. 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"> • Sufficient length of perching space to allow all birds to perch at the same time; and • Sufficient elevation of the perches to satisfy the hens' requirements for a perceived safe perching place at night. <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'⁴.</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 hens⁴. 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^{0.67} (kg)" 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 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)¹ 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 ADFI².</p> <p>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?</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 pen³ not a minimum</p>

standard which is considered acceptable at all times and this should be clarified in the regulation itself.

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.

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.

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.

Due to the above considerations, I propose that the minimum standard is amended to:

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)

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.

Penalty: I support penalty of a prosecutable regulation offence.

- 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.

- 2) Thomas, LL. "The Effects of Increasing Stocking Density on Finishing Pig Growth ..." 2015.

<http://newprairiepress.org/cgi/viewcontent.cgi?article=1142&context=kaesrr>

- 3) ibid. Page 9

- 4) "ANIMAL WELFARE (Pigs) CODE OF WELFARE 2010 REPORT." 2015. 15 May. 2016

		< https://www.mpi.govt.nz/document-vault/1446 >
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 NAWAC¹. 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^{2,3}.</p> <p>I submit that farrowing crates are unacceptable in modern day pork production systems and must be banned outright.</p> <ol style="list-style-type: none"> 1) "National Animal Welfare Advisory Committee - NZPork." 2016. 15 May. 2016 http://www.nzpork.co.nz/images/custom/farrowing-crate-advice-14-march-2016.pdf 2) Weber, R. "Piglet mortality on farms using farrowing systems ... - IngentaConnect." 2007. http://www.ingentaconnect.com/contentone/ufaw/aw/2007/00000016/00000002/art00042 3) KilBride, AL. "A cohort study of preweaning piglet mortality and ... - ScienceDirect." 2012. http://www.sciencedirect.com/science/article/pii/S0167587711003564
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</p>

		<p>appropriate. However, for clarity, I recommend that examples are provided for guidance. Appropriate examples would include straw and sawdust¹</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. http://www.ncbi.nlm.nih.gov/pubmed/20889685</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</p>

		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 loading¹, only one individual was prosecuted in relation to the footage², 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) http://safe.org.nz/nz-dairy-industry-exposed 2) https://www.mpi.govt.nz/news-and-resources/media-releases/mpi-lays-charges-in-bobby-calf-investigation/</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 loading¹. 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) http://safe.org.nz/nz-dairy-industry-exposed</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 calves¹. 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 age¹ 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
		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

		<p>physiological indicators in the 2000 Todd paper¹ does not demonstrate that:</p> <ul style="list-style-type: none"> • this is in fact the case in calves <5 days of age or • that these calves are not experiencing significant hunger or • that these calves have the physiological capacity to respond to transport in a measurable way with the tools used in the study² <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> <ol style="list-style-type: none"> 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
		<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 calves¹ we propose an increase in the infringement penalty to \$1000.</p> <ol style="list-style-type: none"> 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
		<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 administered 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 >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:</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) the 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
		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.</p> <p>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 > 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 < 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.</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
		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.

From: Dominique Mallard s 9(2)(a)
Sent: Thursday, 19 May 2016 12:42 a.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations
Attachments: MPI consultation doc submission 2016.pdf

Categories: Blue Category

Please consider this submission carefully

Yours sincerely
Dominique Mallard

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

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Hello

Thank you for giving me, a concerned member of the public, the opportunity to submit my thoughts on the existing and proposed Animal Welfare regulations.

I do however have to express my disappointment on the short 5 week public consultation period given, as this is nowhere near enough time to read, consider and submit my opinions in relation to this 118 page document, nor the 11 page proposed regulations for the transport of live animals from NZ.

As a result, I have not had enough time to give full consideration to each individual proposal and will state this where appropriate.

The following is my submission on the proposed Animal Welfare regulations:

2.2 CURRENT REGIME

This section describes the current regime, including all the provisions of the Amendment Act that have been brought into force.

Parts 1 and 2 of the Act set out obligations for the care of, and conduct towards, animals. For example, the Act obliges the owner, or the person in charge, of an animal to ensure that the physical, health and behavioural needs of the animal are met in accordance with good practice and scientific knowledge. What constitutes a physical, health or behavioural need is determined by, in each case, what is appropriate to the species, environment, and circumstances of the animal. The definition of 'physical, health and behavioural needs' is based on what is referred to internationally as the 'five freedoms'. These freedoms provide for:

- proper and sufficient food and water;
- adequate shelter;
- the opportunity to display normal patterns of behaviour;
- appropriate physical handling; and
- protection from, and rapid diagnosis of, injury and disease.

The Act also obliges the owner or the person in charge of an ill or injured animal to ensure that the animal receives treatment to alleviate any unreasonable or unnecessary pain or distress. A person commits an offence if they fail to comply with these obligations or kill an animal in a manner that causes it to suffer unreasonable or unnecessary pain or distress.

Considering the above "five freedoms" I feel it is necessary to point out that many animals that fall under the current code of welfare (not including companion animals) are completely misrepresented. I don't believe that NZ codes are up to standard and if serious changes are not made to these current codes in favour of a complete standard overhaul, the government would have failed once again in its commitment to meet the aforementioned "five freedoms".

The Five Freedoms and where the industry fails to meet these standards:

"Proper and sufficient food and water" - example 11.4 The Proposals

47. Young calves- maximum time off feed.

Currently a 30 hour maximum time off feed, proposal suggests reducing to 24 hours.

I do not agree that this new proposal suggests a suitable "no feed"

time period if the ministry considers the regularity of feeds a young calf requires from its mother which is approximately once every four to six hours for the first 6 weeks of its life.

Minimum Standard 10 – Food, Water and Rest

(a) The provision of food and water must be appropriate to the species, age, physical state and condition of the animals to allow them to regulate body temperature and meet their health needs

- (1). That immature animals are left to starve while transporters and slaughterhouse workers require animals to be physically capable of walking without unnecessary handling, I find hard to accept that this proposal can support the new regulation.

(b) If animals are to be fed during the journey, they must either be offered the feed they are accustomed to during the journey; or, if the food to be offered during transport differs from that to which the animals are accustomed, a period of pre-conditioning to the new feed must be undertaken prior to transport.

(d) Unweaned animals must be fed within a maximum of 28 hours after loading for transport, if not slaughtered beforehand. [NOTE - This consultation seeks views on reducing this period.]

See (1)

"Adequate shelter". The proposals set out in this document seem to address concerns in regards to inadequate shelter for animals. However the minimum penalty fees set down in the document do not reflect this and give the impression that there is a lack of seriousness in relation to the infringement. Harsher penalties must be enforced.

"The opportunity to display normal patterns of behaviour" - does the ministry accept that the chewing of bars, tails and cannibalism in pigs/piglets, pecking, plucking and cannibalism in poultry are all considered normal patterns of behaviour? According to ongoing scientific studies, it is not. Unfortunately there has been overwhelming documentation to prove that animals such as pigs and poultry raised in NZ under intensive farming systems display these abnormal behaviours regularly and on a daily basis.

"Appropriate physical handling" - this is another area that has been of significant concern in relation to young animals bound for slaughter. Although rough physical handling of animals is not isolated to the dairy industry it has certainly been brought to the public's attention as of late and the changes proposed in the document reflect this. Once again there is no indication that this abusive handling is deemed serious enough by the ministry when one considers the minimum penalty implied. Harsher penalties must be enforced to reflect the nature of the infringement.

"Protection from, and rapid diagnosis of, injury and disease" - unfortunately I did not have time to properly investigate the document for information regarding this subject because the length of public consultation period was too short considering the size and nature of this work.

3.4 OPTIONS

Each minimum standard or additional matter was assessed to determine whether it should be retained in its current form (Option 1), regulated (Option 2) or addressed through non-regulatory mechanisms (Option 3).

In considering the proposals set out in Part B:

Question 3: Are there any minimum standards or additional matters you think should become regulations immediately, which are not included in the regulatory proposals in Part B?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

Questions 4: Are there any minimum standards or additional matters that you think should be considered for regulation in the future, once the implications of regulating these areas are better understood?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

3.4.2 Option 2: Developing regulations

MPI consider that the proposed regulations, set out in Part B of this document, meet the criteria identified in section 3.3.

Question 5: Are there any proposed regulations, set out in Part B, that should not be regulated?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

Question 6: If so, how should these matters be managed?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

3.4.3 Option 3: Non-regulatory mechanisms.

Question 7: Do you think there should be a wider use of non-regulatory mechanisms? If so, in what situation?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

3.5 WHO IS GOING TO BE AFFECTED?

Question 8: Will the proposed regulations, set out in Part B, change the way you or others currently operate, if so, in what ways? What implications would these have for you?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

4.1 WHAT ARE THE PROPOSED PENALTIES FOR OFFENDING?

Under section 183 of the Act, a regulation can have either an infringement offence or a prosecutable offence¹³ attached. Two levels of infringement fee are proposed (\$300, and \$500) see Table 2.

4.1.1 Infringement

A lower and higher-level infringement fee have been proposed for different regulatory proposals depending on the relative level of harm. The following criteria are proposed:

- a fee of \$300 – where an activity has the potential to cause low-level harm to an individual animal or small number of animals; or
- a fee of \$500 – where an activity has the potential to cause moderate harm to an individual animal or small number of animals.

To belittle this process by using a "parking ticket fine" as the example is a huge concern for me. Where is the impetus to ensure that the handlers of these animals are aware of the penalties involved if it is basically delivered like a slap on the hand?

Question 9: Are the infringement offences and respective fees proposed for breaches of the proposed regulations, outlined in Part B, appropriate? Should any of the proposals attract higher or lower fees or penalties?

No they are not appropriate. All proposals outlined in this document must attract higher fines. A person mishandling or causing harm to an animal must first be caught which in itself is not a deterrent considering most perpetrators would perform abusive actions in private or amongst others with similar approaches to animals.

By raising the minimum fines this sends the clear message that abuse at any level will not be tolerated and heavy fines will be enforced should the perpetrator be caught.

In other words, the low penalties (\$300-\$500) outlined above are not substantial enough to deter offences.

If the maximum fine is \$1000 then this should be the minimum fine attached to a "moderate" infringement.

Minimum fine of \$600-\$700 for the above described "low level" offences.

Question 10: Are the prosecutable offences proposed in the regulations appropriate? If not, why not?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

Question 11: Should any of the proposed regulations, set out in Part B, include a mental element (e.g. intention, knowledge or recklessness)? If so are the penalties for a prosecutable offence under regulation (see Table 2) appropriate for the regulated activity?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

Question 12: What defences do you think should be available if the proposed regulations are breached and why?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

Question 13: Would it be appropriate to expand the second defence above to include "...necessary for the preservation, protection, or maintenance of human or animal life."? If so, in what circumstances, and which regulatory proposals would this apply to?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

Question 14: Do any of the proposed regulations, set out in Part B, require a lead-in period? If so what period is reasonable? Are there any other challenges relating to the timing of regulations coming into force?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

Question 15: How should the codes of welfare be amended by the proposed regulations to ensure the codes continue to work effectively within the legislative scheme?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

Question 16: Which of the approaches as outlined above, or combination of approaches do you support?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

Question 17: What other options to amend the codes are there?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

Question 18: How should MPI best engage with stakeholders to monitor and review the impact of the proposed regulations?

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

10.2 THE PROPOSALS

1. Electric prodders

1. Cause pain and discomfort for all animals. Electric prodders should be prohibited.

17, 18, 19. Layer Hens

Hens raised under intensive housing systems are AT NO TIME able to express their natural behaviours. Colony cages are NOT an acceptable alternative to the previous conventional cages. Free Range farming is the ONLY acceptable alternative to both conventional and colony cages.

While animals remain behind "closed doors", the public are unable to report animal abuse (even though this is the very nature of intensive housing systems) or non-compliance of the law nor can farmers or workers in charge of these animals be held accountable for unseen actions.

24, 25. Pigs

Pigs raised under intensive housing systems are AT NO TIME able to express their normal and natural behaviours.

While what is being proposed for pigs in regards to dry sleeping areas and lying space for grower pigs could be considered an improvement on current practices in the law, it is not a positive nor an acceptable long term plan for NZ's pigs.

The only acceptable alternative to the current sub standard housing conditions in NZ is that animals are ranged freely. While this will undoubtedly be viewed as an unrealistic option for NZ's commercial pig farming industry, the ministry must consider how to further improve the standards currently being proposed.

While animals remain behind "closed doors", the public are unable to report animal abuse (even though this is the very nature of intensive housing systems) or non-compliance of the law nor can farmers or workers in charge of these animals be held accountable for unseen actions.

27, 28. Pigs

Farrowing crates MUST be prohibited if NZ wishes to remain credible within the changing and advancing international farming system models.

30. Exotic Animals - used in circuses

There must be a complete Prohibition of animals used in circuses

33. Cattle and sheep- ingrown horns

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

34. Stock transport - cuts and abrasions

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

35. Stock transport - animals with ingrown horns

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

36. Stock transport - animals with bleeding horns or antlers

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

37. Stock transport - animals with long horns or antlers

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

38. Stock transport - lame cattle, deer, pigs and goats

I did not have time to properly address this question because the length of public consultation period was too short considering the size and nature of this work.

39. Stock transport - animals that can't bear weight evenly due to injury

I did not have time to properly address this proposal because the length of public consultation period was too short considering the size and nature of this work.

40. Stock transport - pregnant animals

I did not have time to properly address this proposal because the length of public consultation period was too short considering the size and nature of this work.

41. Stock transport - animals with injured or diseased udders

42. Stock Transport - Cattle or sheep with cancer eye

Although I did not have time to properly address these proposals because of the limited time given, I wonder if any thought had been given to the reasons why an animal presenting with such symptoms would be suffering from these conditions in the first place? Would the farmer be investigated for allowing his/her animal/s to be in such a condition? Should the public assume that cases such as these would be covered by the animal welfare code?

11.0 Young calf management regulatory proposals

I did not have time to properly address this section because the length of public consultation period was too short considering the size and nature of this work.

However in regards to:

47. Young Calves - maximum time off feed

The reduction of maximum time off feed from 30 hours to 24 hours is not good practice and should not be industry standard. Young animals of any species should not be left for any longer than 6 hours between feeds and to consider a period longer than this would be deemed cruel.

Young animals who are required to be physically healthy at the time of transportation and fit for slaughter, surely cannot be expected to be such with minimal sustenance?

In addition, if said animals were fed more regularly, then communication between drivers and farmers (and others in the supply chain) wouldn't have to be as prudent, leaving the suggestion of young animals left without food and water, a non issue?

12.0 Surgical and painful procedures

I did not have time to properly address this section because the length of public consultation period was too short considering the size and nature of this work.

Consultation document on the proposed regulations for the transport of live animals from NZ

I did not have time to properly address this section because the length of public consultation period was too short considering the size and nature of this work.

From: Samantha Penman <§ 9(2)(a)>
Sent: Tuesday, 17 May 2016 12:58 p.m.
To: Animal Welfare Submissions
Subject: Please see attachment on my thoughts on the proposed changes
Attachments: MPI-submission.docx

Categories: Green Category, Blue Category

Kind regards,

Samantha Penman

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).

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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.

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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.

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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 (m²) 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/m² 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

3 submissions

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Out of Scope

From: Sarah Clews s 9(2)(a) >
Sent: Sunday, 15 May 2016 9:22 p.m.
To: Animal Welfare Submissions
Subject: Welfare proposals-submission
Attachments: MPI submission.docx

Categories: Blue Category

From a soon-to-graduate veterinary student. Sort it out, please. Be leaders.

Sarah Clews

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)

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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 (m²) 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 (competing 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/m² 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

Submission on Animal Welfare Regulations

Paul Corboy

Sheep and Beef Farmer

s 9(2)(a)

My wife and I farm 11000 SU of sheep and beef cattle. I have 35 years of hands on farming experience in a wide range of environments, combined with an Agricultural degree which included Animal Science.

We place a high importance on good animal welfare, with the correct handling of heavy beef cattle a priority.

I am in agreement with the majority of the proposals that are relevant to our industry, but my main concern is that the cumulative effect of some of the proposals concerning cattle would have a major, and detrimental, impact on the handling of beef cattle in on farm cattle yards. Sheep are not an issue as they can be physically manhandled.

Common yard work, especially that involving a single file "race", scales, headbails etc. would become very difficult and slow if we are not able to use our current methods of persuasion to make cattle enter a space that they are wary of. Please note that this doesn't imply that they are terrified of where we want them to go, just unsure.

ELECTRIC PRODDERS

I support the intent of the proposal, but the problem is really the overuse of the prodder on an individual animal causing it to become distressed.

A prodder is a very valuable tool when trucking cattle as the situation is often all new and intimidating to the animals, as well as potentially dangerous to personnel as they are working in confined and restricted spaces.

It is common practice to use a prodder on the bare area around the tail-head, which contains the anus and the vulva which are not the target, and should not be. These sensitive areas are protected by the tail, as long as it is not lifted or bent aside. The rationale behind prodding the bare skin is that

one good shock is much more effective, and less stressful, than a number of smaller shocks that can result from prodding a thick, hairy hide.

It is important that the animal being prodded has somewhere to move away from the prodder.

USE OF GOADS

I support the prohibition of the use of goads on sensitive areas, as described in the proposal, IF they cause pain or distress.

However, it should be noted that in nature cattle have always used their horns to prod and poke their herd mates to express dominance etc.

It is good cattle handling practice to use light sticks or lengths of plastic pipe to poke cattle to keep them moving quietly in yards. It only stimulates the animal that is the immediate target and importantly doesn't upset others nearby. As described earlier the anus and vulva are protected by the tail if the tail-head area is poked as it often is, if standing behind the animal, as other areas at the rear often result in a kick at the handler.

Cattle are not distressed by the careful use of goads, and their use is important to keep cattle settled and flowing through yards.

For the occasional belligerent animal a whack on the nose is useful to ensure personal safety.

TWISTING AN ANIMAL'S TAIL

This proposal seems to be a reaction to recent bad publicity of tail breaking. Man has twisted animal's tails for thousands of years to encourage animals to move. It is comparable to the police force using arm twisting to restrain offenders.

Tails are actually very difficult to break, unless that is aim of the exercise

An animal in a single file handling race is usually grabbed by the tail to stop it reversing – the only safe way in most yards, and while not strictly twisting it could get caught by the proposal.

A twist of the tail, often very slight, is regularly used to persuade both sheep and cattle to move onto scales and other "dead-end" spaces. This causes insignificant pain or distress, and the degree of twisting is very controllable and suitable for the situation.

I submit that the proposals should not be implemented, but that deliberately breaking tails remains as a serious offence.

VEHICULAR TRACTION IN CALVING AND LAMBING

A high risk procedure. Only used as a last resort, in rare circumstances.

Provided that the cow or ewe is not restrained the pull will be limited by the friction that the animal has with the ground.

Not to be encouraged, but not worth regulating.

STOCK TRANSPORT – CUTS AND ABRASIONS

A problem caused by truck crates being built to standard specifications due to height restrictions etc. Unfortunately, cattle aren't all uniform in size, taller cattle may be affected when the majority won't have a problem.

Only an issue if it keeps recurring for the same farmers.

SURGICAL AND PAINFUL PROCEDURES

The intent of the proposals is acceptable, but there are times when circumstances make the ideal of using a vet not viable.

If it were made simple for farmers to have stocks of pain relief medications on hand at all times it would be less of a problem

CATTLE AND SHEEP – CASTRATION

For cattle, is age the best criteria?

The issue is the size of the scrotum and testes – some calves at six months are no problem, others have much larger testes at the same age. There is also always a range of ages of calves in a herd, a few "early" calves usually get marked with the main part of the herd but may be a few months older.

Is weight a better criteria?

Weight is more closely related to testes size, but as always there are variations.

A suggestion would be 250 kg or slightly more.

Surgical castration should be left as an option for experienced and skilled "non vets" for occasional situations where rings cannot be used, eg. "short cords".

From: Carolyn Walker <s 9(2)(a)>
Sent: Thursday, 19 May 2016 9:01 p.m.
To: Animal Welfare Submissions
Subject: Factory Farming submission

To the Ministry of Primary Industries, Nathan Guy
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. Please ensure there is resources in place to monitor and fine those who do not uphold these regulations.

Factory farming is an abhorrent practice, and New Zealand needs a long term strategy for phasing it out. Consumers don't want to eat food from animals held in cruel conditions. 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.

We understand your role is focused on financial gain for the industries you are in charge of. If you take Fonterra's Organic dairy farming pay out this year it indicates consumers want to buy goods that are ethically farmed. Make it more of your role to encourage this.

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

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

A country is judged on how it treats its animals.. How do people view New Zealand in relation to the practices carried out here?

regards
Carolyn Walker
s 9(2)(a)

From: Robert Alcantara <s9(2)(a)>
Sent: Thursday, 19 May 2016 8:10 p.m.
To: Animal Welfare Submissions
Subject: 61 62 submissions





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Ministry for Primary Industries
Manatū Ahu Matua



Animal welfare proposed regulations feedback submission form

Your name: Robert A Alcantara Jr

Your organisation (if applicable): _____

Your contact details: _____

Your feedback: 61 Dewclaws; In my experience
in the dog Grooming industry I see many
untreated dewclaws on many coated breeds.
most pet owners do not see the dewclaws.
I have attached a photo of a common occurrence.
Prohibiting the removal of dewclaws
will have a negative affect on the dogs.
The current regulation is good and
no change to it is needed. The unfortunate
side to this is many of the dogs that
come into our businesses are not pure bred.
MPI Has existing laws of welfare
on this issue and it needs to remain
as is. I agree that dewclaws should be
removed by a vet or qualified person under
a documented quality assurance scheme

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

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

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

Submissions close 5pm 19 May 2016.

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



Animal welfare proposed regulations feedback submission form

Your name: Robert A. Alcantara Jr

Your organisation (if applicable): _____

Your contact details: _____

s 9(2)(a)

Your feedback: 62 Tail Docking!

It is very clear that a in depth study
has not been done to prohibit the existing
code. There is a quality assurance scheme
in place with no complaints. There is no
evidence to prove change need to take place
I am a breeder of dogs that dock tails
and breed that do not dock. You are
removing a NOTICE. I have read
your listed studies and as a Behaviourist
for 30 years I have had no difficulties
in communicating nor difficulties understanding
the dogs body language with a docked tail
Bob tail or Full tail. Anyone who relies on only
that need (K-9 101). It is not NPT position
to make law. I am strongly against the
proposed changes. Pups do not feel pain.

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

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

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Animal Welfare proposed regulation feedback submission form

Email to: animal.welfaresubmissions@mpi.govt.nz before 5PM 19 May 2016

National Dog Groomers Association of New Zealand

Sheila Morris

s 9(2)(a)

Email: s 9(2)(a)

Member contact details: Name, address, email phone number

Robert A. Alcantara Jr, s 9(2)(a)

The National Dog Groomers Association of New Zealand was founded in 1990 and our group now has a membership of 377 and growing.

This is an organization representing the standards, goals, aspirations and image of the Professional Pet Groomers. Our primary intention is aimed at uniting groomers through membership and in this way we hope to form a professional and sincere alliance that will benefit the grooming industry by recognizing the true and committed professional. NDGA provides advanced continuing educational programs designed to enhance the expertise and business acumen of professional pet groomers and provides one an opportunity to expand professional contacts, to make friends with individuals with common interest.

NDGA along with continuing education has formatted Master Groomer's program for those groomers wanting to bring their skills to Global industry standard. It involves a 4 year process featuring Gun Dog Group, Terriers Group, Non Sporting Group and a Final exam on Toy Group. The groomer must do a

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workshop for each group, complete a timed practical exam and sit a written exam on each group to gain breed specific knowledge. The practical exam is graded by an examiner and not all pass. Along with the importance of skill NDGA advocates safe operating standards. Health and Safety and good Animal Welfare practices are at the top.

Feed Back on 61 Dogs Dew Claws The proposed regulations state Front Limb dew claw removal and articulated (jointed) hind limb dew claw removal:

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

Must only be performed for therapeutic reasons; and

Pain relief must be used at the time of the procedure

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

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

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

National Dog Groomers Association of New Zealand disagrees with this proposal in its entirety.

The dog grooming professional members groom an average of 6 to 10 dogs a day. The groomers are the first stop to finding problems relating to dew claws or many health issues. We see a variety of breeds and a very high percentage of mixed breed dogs. We see at least 7% of our monthly grooms with dew claw problems. We see curled around nails in bedded into the dogs flesh causing severe tissue damage. This has many times has been long term and considerably painful to the dog. There are 377 members and there are more groomers out there not members so the statistics are low.

Based on 10 dogs groomed a day by our members is 75,400 grooms per month at 7% gives us 5,278 dogs with dew claw issues. The grand total of 63,336 dogs

a year before a veterinarian even see's the dog. Most people do not like cutting their dogs nails and leave it until it is too late.

It is our understanding that MPI partly funds RSPCA and NAWAC, yet they are both major stakeholders in writing this proposal which we see as one sided and not factual. The NZKC has a large membership of 6000 members and our NDGA with a membership of 377 were not considered as a major stakeholder. Not to include the fact our members service modestly 904,800 grooming dogs annually. Most times we are the first stop in identifying a problem with a dog.

Many of our members are acting under the documented quality assurance scheme that assures compliance with in the minimum standard. As far as we know there are no complaints about the existing accredited scheme.

When the qualified individuals perform the removal of dew claws the puppies are in the **NOENATE** puppy age 4 days of age or under. At this time, it is a well recognized fact that the toes and tail are the last part of the neonate puppy to calcify and develop into bone. The neonate dewclaw is removed without cutting through bone and does not bleed when performed correctly. This falls under the non articulated bone.

NDGA believes the breeder should have the choice to remove dew claws and should be done by an accredited scheme or veterinarian.

Photo's to be attached:

Gail Blankley

s 9(2)(a)

Send to:

animal.welfaresubmissions@mpi.govt.nz

And

Your MP

john.key@parliament.govt.nz

and

nathan.guy@national.org.nz

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

19th May 2016

**Submission on the Animal Welfare Act Review
Personal Information – Withheld**

Dear Panel

As a Breeder of a historically Docked breed and owner of a gundog breeds for nearly 40 years; I would like to put forward my submission on the following.

Item 5.3

I do not believe the RNZSPCA is a fit and proper body able to be impartial to issue the new infringements. They have proved to be to emotive and selective like their UK counterparts. Who you are wanting to follow. I attended your Auckland meeting where you said you where only interested in facts and science. I there fore attach links (1) to articles of issues that have arisen with the R SPCA's conduct in the UK of over stepping the boundaries and strong criticism of their conduct by high court Judges. I fear we are following in their footsteps.

I also question the ethics of self involvement in making and enforcing these regulations. The SPCA already is part of the MPI regards investigation and prosecution, I don't believe it is right to palm a Government job off onto a charity organization of volunteers many of whom are emotive and ignorant and do not have 1st hand practical experience

See attached documents.

I would also like to make comment on the NZVA involvement.

1. Their tail docking survey which they report that there is not a problem with tail injuries in New Zealand is technically flawed as the dogs in question are to date docked at birth.
2. Have ignored a successful accredited banding programme
3. Have failed to acknowledge the practical experience breed specific knowledge of owners and breeders of traditionally docked dogs.
4. Failed to acknowledge or recognise any variations in the tail structure/form and function between dog breeds. (There are over 150 different breeds)

5. Failed to provide any proof of pain either scientific or anecdotal, as requested by the 2012 NAWAC committee.

6. Failed to acknowledge the in excess of 170 countries in the world DO NOT have a ban on the docking/shortening of dogs tails. Only 30 do and some countries are now considering reversing their ban i.e. Scotland.

7. Relied on their own creditability by accepting the anecdotal evidence provided by NZVA and SPCA, most who are not experienced dog breeders yet do not afford the same credibility to our own members who are. This can be remedied by aligning the banding with the exemption; the committee has been prepared to give to Production animals, namely pigs and sheep.

2. I also question the ethics of self involvement in making these regulations, when they have an financial vested interests i.e. docking a pups tail or removing dew claws at vets used to be about \$10.00 but an adult dog that comes in with tail damage or ripped dew claws you would be looking at hundreds if not thousands of dollars in costs.

Item 61. Dogs - Dew claw removal I request that this continues to be allowed in NZ as is the current approved practice. By accredited practitioners.

Performed correctly there is no bone cut though, there is no bleeding. Breeders are scrupulously conscious of sterile conditions so there is very limited chance of infection.

Dew claw's not removed and damaged or ripped as an adult cause excruciating pain and would require major surgery to remove. I view their removal as a new born a preventative for the future well being of the pup. The same as I view Tail Docking and vaccinations.

Item 62. Dogs - Tail docking I request that this continues to be allowed in NZ as is the current approved practice. By accredited practitioners.

The Accredited Banders Scheme which follows strict guidelines and is strictly audited by the NZ Kennel Club to ensure compliance with agreed protocols and current Code of Animal Welfare.

Gundog breeds with long whippy tails historically docked would commonly injure their tails while hunting through vegetation and thick scrub or today in everyday life pursuits. Their fast tail action often leads to splitting or tearing and bleeding which is painful and extremely difficult to treat. Because of the long thin tail, the end has very poor circulation which makes healing difficult and prone to infection.

All Tails are not created equal. The GSP's tail like many of the Versatile Gundog breeds, which is a man made breed which didn't get the tail right. Unlike the Labradors who have a thick well covered tail. So historically the fore fathers of the breeds where aware of this weakness and docked accordingly for the well being of their dogs. Undocked they would be very prone to damage in the dogs environment be this rural or urban. The only resolution for an undocked adult Versatile dog suffering from chronic tail damage is a painful and traumatic amputation which as an adult is major surgery to remove.

Undocked, the interaction of the tail conformation, breed activity and the environment causes increased risk of injury through the life of these breeds.

The Shortening of the weak portion of the tail humanely at a few days old eliminates the risk of injury. By shortening but still retaining a substantial tail occurs once and protects against chronic pain and discomfort for life, typically 12 to 15 years.

.The proposed new regulations on tail docking are not consistent with, pigs and sheep also in the review. Why are there rules for one and not the other, irrespective of if they are production or companion animals? Dogs are born with undeveloped nervous systems and there is no scientific evidence to suggest they feel any pain at all when banded within 4 days of birth- vs. production animals that are born to flee so have a fully developed nervous systems at birth-yet removal of the tail is permitted by untrained people (in case of sheep, up to six

months of age, and pigs up to 7 days of age). The reason for the procedures is the same – to prevent the animal from suffering.

The NZVA research study that found little evidence of tail damage in dogs in New Zealand is totally flawed. Because the dogs prone to tail damage are to date docked as newborns.

They also failed to acknowledge the in excess of 170 countries in the world DO NOT have a ban on the docking/shortening of dog's tails. Only 30 do and some of those countries are now considering reversing their ban i.e. Scotland. (See attached Survey of tail injuries sustained by working gundogs & terriers in Scotland R Leaderer, D Bennett and T Parkin.)

I view Tail removal in a new born in the Gundog breeds historically docked, as a preventative measure for the future health and well being of the pup. The same as I view Dew claw removal and vaccinations for the dog's future well being. So for the welfare of working gundog's breeds in NZ, I ask that you consider this practice to continue to be allowed.

Thank you for taking the time to read this submission.

Yours sincerely

Gail Blankley

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Attachment 1.

RSPCA at risk of losing royal title.

<http://www.shootinguk.co.uk/news/rspca-at-risk-of-losing-royal-support-52321>

RSPCA losing credibility with British conservative MP's after board member compares farming animals to the Holocaust.

<http://www.shootinguk.co.uk/news/rspca-may-lose-credibility-after-activists-join-council-45334>

Wooler report shows lack of accountability or transparency in RSPCA, damage to credibility from prosecutions: Public donations dropped by 7 million pounds last year.

<http://www.shootinguk.co.uk/news/wooler-report-tells-rspca-stop-prosecuting-protect-reputation-40693>

Explanation of Wooler Report & judicial criticism:

This latest case of judicial criticism of the RSPCA comes at a time when the charity's policies on bringing prosecutions are being reviewed by former HM chief inspector of the Crown Prosecution Service Stephen Wooler. Mr Wooler's appointment was prompted by the Attorney General late last year following a number of cases in which the RSPCA's practices had been criticised.

Read more at <http://www.shootinguk.co.uk/news/rspca-criticised-by-judge-for-overstepping-the-mark-165#RS1z1U1xG5oHxbFw.99>

Charity Commission investigating "bullying tactics" and intimidation of farmers:

<http://www.shootinguk.co.uk/news/rspca-still-under-investigation-653>

District Judge criticises RSPCA. Cross party of MP's claims charity has "failed in their duty of prudence".

The meeting with the Charity Commission was set after a cross-party group of politicians, including Lord Heseltine, Kate Hoey MP and Simon Hart MP, former chairman and chief executive respectively of the Countryside Alliance, accused RSPCA trustees of failing in their "duty of prudence" to the organisation and its funds. They called on the Charity Commission to investigate.

Read more at <http://www.shootinguk.co.uk/news/charity-commission-calls-in-rspca-1596#qpXtKZf4XXGsJgRt.99>

There's also criticism that UK Police have admitted they have been secretly sharing private and personal records (such as criminal records and vehicle traces), with these bully's despite the RSPCA having no legal authority to request such data.

<http://www.shootinguk.co.uk/news/rspca-access-to-police-records-revealed-869>

RSPCA criticised for relentlessly persecuting individuals on no-cost-spared basis:

The RSPCA was stung by the media and public reaction to its £327,000 prosecution of a hunt in Prime Minister David Cameron's constituency last December. Opinion polls showed the charity's reputation was seriously dented by evidence of politicisation and profligacy with public donations (News, 30 January).

The RSPCA is probably the second biggest criminal prosecutor in the country, bringing thousands of cases every year. It is worrying to think how often the RSPCA's tactics might work to produce a miscarriage of justice.

Read more at <http://www.shootinguk.co.uk/features/why-the-rspca-charges-into-court-987#ofXcwr7Fg8p7FAOX.99>

Read more at <http://www.shootinguk.co.uk/features/why-the-rspca-charges-into-court-987#ofXcwr7Fg8p7FAOX.99>

Paper

Survey of tail injuries sustained by working gundogs and terriers in Scotland

R. Lederer, D. Bennett, T. Parkin

Working dog owners in Scotland were invited to take part in an internet survey regarding the 2010/2011 shooting season, which was designed to estimate the prevalence of tail injuries; assess the risk of tail injuries in docked and undocked working dogs; and identify risk factors for owner-reported tail injuries. Of 2860 working dogs, 13.5 per cent sustained at least one tail injury during the 2010/2011 shooting season. Undocked spaniels and hunt point retrievers (HPRs) were at greatest risk of tail injury with 56.6 per cent of undocked spaniels and 38.5 per cent of undocked HPRs sustaining at least one tail injury during the season. There was no statistically significant difference in the risk of tail injury in dogs with tails docked by one-third, half or shorter. To prevent one tail injury in one shooting season, between two and 18 spaniels or HPRs would need to be docked as puppies. The authors believe that this work provides the best available evidence on which to base a consultation for changes to the legislation on tail docking in working dogs in Scotland. Docking the tails of HPRs and spaniels by one-third would significantly decrease the risk of tail injury sustained while working in these breeds.

Introduction

The dog was the first species to be domesticated (Mills 2010) and exists today as more than 400 breeds worldwide (Fogle 2000). The selection by humans for diverse functions led to the existence of specific breeds of dogs, which were further defined by Kennel Clubs' breed standards, increasingly based on a dog's physical appearance (Mills 2010). Historically, tail docking was performed in many breeds for a variety of reasons (Morton 1992). Until recently 29 per cent (61/210) of breeds currently eligible for registration in the UK were either sometimes docked or routinely docked (Bennett and Perini 2003).

Tail docking of dogs for non-therapeutic (that is prophylactic or cosmetic) reasons has been banned in Great Britain since 2007 when the Animal Welfare Act 2006 and The Animal Health and Welfare (Scotland) Act 2006 came into force. However, amendments made to the Act (DEFRA 2007a,b) allow the docking of certain working dogs or working dog breeds. More recently the Welfare of Animals Act (Northern Ireland) 2011 came into force with similar exemptions (DEFRA 2012). However, The Animal Health and Welfare (Scotland) Act 2006 (DEFRA 2006) includes a total ban on non-therapeutic docking of dogs, with no exemptions.

Tail docking in any species poses an ethical dilemma, considering the pain during and after removal as well as the animal's long-term welfare, and taking a utilitarian approach, seems justifiable

only if it protects the animal from greater suffering if not performed (Morton 1992, Bennett and Perini 2003). The ethical problems and health issues involved with tail docking have been described in depth elsewhere (Morton 1992, Holt and Thrusfield 1993, Wansborough 1996, Bennett and Perini 2003). Earlier studies by Darke and others (1985) and Diesel and others (2010) found a relatively low incidence of canine tail injuries in veterinary practice data of 0.39 per cent and 0.23 per cent, respectively. However, a higher incidence of tail injury in working dogs has been claimed by country sports organisations who would welcome amendments to the legislation to bring Scotland into a similar legal position as England, Wales and Northern Ireland. When introducing the ban in Scotland the Scottish Government agreed that if evidence came to light that the ban was compromising the welfare of dogs, they would review the position. They have since funded research projects to assess the impact of the ban on, for example, the risk of tail injury in undocked working gundogs and terriers, especially spaniels and hunt point retrievers (HPRs).

This paper describes the first study of a Scottish Government commissioned project aimed at providing evidence regarding the welfare of undocked working dogs in Scotland and comprised an internet survey of owners of working dogs and of terriers used in pest control in Scotland. The survey was designed to estimate the prevalence of tail injuries in these working dogs; assess the risk of tail injuries in docked and undocked working dogs; and identify risk factors for tail injuries. The second study used veterinary practice records to describe the prevalence of more severe tail injuries in working and non-working dog breeds that were deemed by owners to require veterinary treatment (Cameron and others 2014).

Materials and methods

An internet survey was designed using Survey Monkey and advertised through three major country sports organisations: the Scottish branch of the British Association for Shooting and Conservation (BASC, Scotland), the Scottish Countryside Alliance (SCA) and the Scottish Gamekeepers Association (SGA). The survey was activated to receive responses between August 8, 2011 and October 3, 2011 and included mainly retrospective questions about any injuries which dogs sustained

Veterinary Record (2014)

doi: 10.1136/vr.102041

R. Lederer, BVSc, Dr med.vet., PhD, MRCVS,
D. Bennett, BSc, BVetMed, PhD, DVM
DSAO, FHEA, MRCVS,
School of Veterinary Medicine, College
of Medical, Veterinary and Life Sciences,
University of Glasgow, Glasgow, UK
T. Parkin, BSc, BVSc, PhD, DipECVP,
FHEA, MRCVS,
Boyd Orr Centre for Population and
Ecosystem Health, School of Veterinary

Medicine, College of Medical, Veterinary
and Life Sciences, University of
Glasgow, Glasgow, UK

E-mail for correspondence:
Tim.Parkin@glasgow.ac.uk

Provenance: not commissioned;
externally peer reviewed

Accepted March 7, 2014

Paper

during the 2010/11 shooting season. Participants were required to have their permanent residence in Scotland and to own a working gundog or a terrier in pest control. It was emphasised that owners should take part in the survey regardless of whether or not their dogs had sustained injuries during the time in question. Completion of the questionnaire was only allowed once per internet protocol address but participants were able to exit and resume the survey at a later time. If requested, participants ($n=39$) were sent a paper version of the questionnaire. The survey consisted of 20 questions and responses were stored automatically as participants progressed through the survey. Some questions were answerable as free text; others were presented as multiple choice questions or as drop-down menus. The questionnaire was developed and piloted with significant contribution from the steering group established to oversee the project. It included questions on membership of shooting-related organisations, numbers and breeds of dogs owned, age, gender and tail length of all dogs owned, country in which the dogs were bred, numbers of injuries (tail and other) sustained by all dogs owned and specific details of the 'worst tail injury' sustained by each dog. To examine the potential for non-responder bias the survey was subsequently administered by hand to a set of gamekeepers and BASC members who did not respond to the original online survey during the SGA's Annual General Meeting and BASC's Gamekeeper day. The breed groups (see online supplementary Table S1) were defined according to The UK Kennel Club (www.the-kennel-club.org.uk) and contain breed crosses within each group. A copy of the questionnaire is available from the corresponding author.

Statistical analysis

Data were automatically downloaded from Survey Monkey into an Excel spreadsheet. All statistical analyses were performed using Stata V.11 (S.E.) statistical software. Epi-Info 6 was used to calculate statistical power.

A sample size calculation was conducted, which indicated that a total of 100 cases of tail injury, with many more responses relating to dogs without tail injury, would yield more than 80 per cent statistical power to identify odds ratios (ORs) of at least 2 (or 0.5), with 95 per cent confidence, given exposure prevalences in the uninjured population of between 14 per cent and 64 per cent. Given a conservative prevalence estimate of tail injury of 5 per cent, the original aim was therefore to gather responses relating to 2000 dogs, of which at least 100 would have sustained a tail injury in the last year.

Dogs ($n=16$) that were reported by owners to have natural bobtails were removed from the dataset before analysis. Simple comparisons of prevalence estimates were made using χ^2 tests. Univariable, multivariable and mixed-effects logistic regression models were produced for three outcomes (tail injury in all dogs, tail injury in spaniels only and tail injury in HPRs only). A forward selection procedure was used during all model building. Variables with P values <0.2 were considered for inclusion in the multivariable model. Variables were retained in a multivariable model if likelihood ratio test P values were <0.05 . The Wald test P value was used for categorical variables. Potential confounders were evaluated by resubmitting all of the variables from the univariable analyses that were not included in the final models, one at a time. Confounding would have been indicated by significant changes in the ORs or 95% confidence intervals (CIs) associated with variables included in the multivariable models. The hierarchical nature of the dataset, with dogs clustered within respondent, was accounted for by inclusion of respondent as a random effect in all final multivariable models.

Results

Characteristics of the survey participants are listed in online supplementary Table S2. A total of 1035 respondents participated in the survey, of whom 848 (81.9 per cent) completed the whole questionnaire. Participants were commonly members of a number of the organisations used to publicise the survey and most (62.3 per cent, 632/1015) described their primary activity relating to working dogs as being a 'recreational shooter'. A total of 2860 dogs were owned by 1005 respondents, who owned at least one dog.

Characteristics of the dogs included in the survey are listed in Table 1. The majority (1657, 70.0 per cent) of all dogs included in the survey

TABLE 1 Characteristics of working dogs included in the survey

Variable	Category	N (% of total for each question)	
Country in which bred	England	578 (24.4)	
	Scotland	1657 (70.0)	
	Ireland+Northern Ireland	49 (2.1)	
	Wales	48 (2.0)	
	Other	36 (1.5)	
	Total	2368	
Breed group	Spaniel	1330 (51.8)	
	Retriever	727 (28.3)	
	HPR	207 (8.1)	
	Terrier	200 (7.8)	
	Pointer/setter	43 (1.7)	
	Other	59 (2.3)	
	Total	2566	
Gender	Female entire	1087 (45.9)	
	Female neutered	308 (13.0)	
	Male entire	837 (35.3)	
	Male neutered	137 (5.8)	
	Total	2369	
Housed	Both inside and outside	497 (21.0)	
	Indoors	751 (31.7)	
	Outdoors	1123 (47.4)	
Tail length	Total	2371	
	Docked short	287 (12.1)	
	Docked by half	394 (16.6)	
	Docked by one-third	484 (20.4)	
	Docked tail tip only	89 (3.8)	
	Natural bobtail	16 (0.7)	
	Undocked	1101 (46.4)	
	Total	2371	
Age at time of survey (years)			
Number (%) bred in Scotland	Spaniels	265 (51.5)	495 (79.5)
	HPRs	52 (48.6)	42 (52.9)
	Retrievers	273 (88.3)	306 (85.7)
	Docked short	47 (7.7)	107 (17.6)
Number (%) of spaniels of each tail length	Docked by half	115 (18.8)	197 (32.4)
	Docked by one-third	207 (33.8)	225 (37.0)
	Docked tail tip only	48 (7.8)	27 (4.4)
	Natural bobtail	1 (0.2)	1 (0.2)
	Undocked	194 (31.7)	51 (8.4)
	Total	612	608

HPR, hunt point retriever

originated from Scotland. The majority of working dogs in the survey were either spaniels (1330, 51.8 per cent) or retrievers (727, 28.3 per cent). Most (1254, 52.9 per cent) dogs had their tails docked to some extent (484, 20.4 per cent docked by a third; 394, 16.6 per cent docked by half; 287, 12.1 per cent docked short (docked shorter than by one half of normal tail length); and 89, 3.8 per cent with a tail tip dock only). Among the spaniels, 973 (79.8 per cent) dogs had a docked tail (432, 35.4 per cent docked by a third; 312, 25.6 per cent docked by half; 154, 12.6 per cent docked short; and 75, 6.1 per cent with a tail tip dock only).

When comparing spaniels of different ages, born before or after the introduction of the tail docking ban, the percentage of spaniels bred in Scotland has gone from 79.5 per cent (495) to 51.5 per cent (265) and the percentage of undocked working spaniels has increased from 8.4 per cent (51) to 31.7 per cent (194) since the introduction of the ban.

When asked whether their dog(s) had any tail injuries during the survey period 29.3 per cent (260) of owners stated that one or more of their dogs had sustained a tail injury. Of 2356 dogs whose owners completed this part of the questionnaire, 317 (13.5 per cent) had sustained at least one tail injury during the previous shooting season. Of dogs that sustained at least one tail injury, the number of tail injuries per dog is shown in Fig 1. Almost 42 per cent (132/317) of these dogs sustained two or more tail injuries and 13.2 per cent (42/317) sustained four or more tail injuries during the previous shooting season.

Compared with pointer/setters, retrievers or terriers, combined (7.0 per cent, 61/876), spaniels (17.8 per cent (221/1238); P value <0.001)

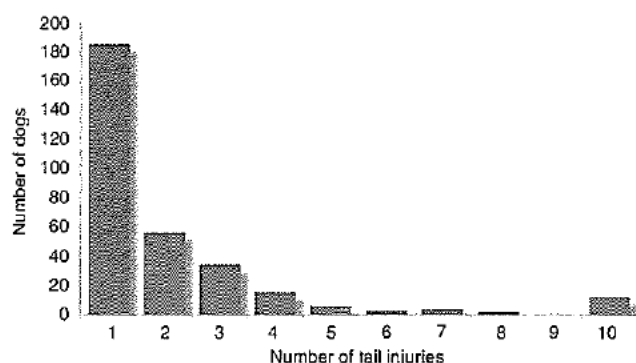


FIG 1: Histogram of number of tail injuries per dog in those dogs that sustained at least one tail injury during the 2010/2011 shooting season

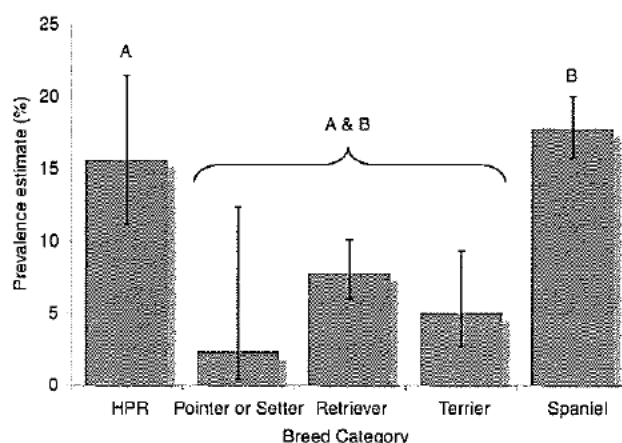


FIG 2: Prevalence of tail injury in each breed group during the 2010/2011 shooting season (showing 95% CIs). A & B indicate breed groups for which the prevalence estimates are statistically significantly different (A: P value<0.001; B: P value<0.001)

and HPRs (15.6 per cent (30/192) P value<0.001) were significantly more likely to have sustained at least one tail injury (Fig 2).

Among spaniels 54.7 per cent (129/236) of undocked dogs and 20.8 per cent (15/72) of dogs with a tail tip dock had experienced at least one tail injury during the survey period (Fig 3). Both undocked spaniels (P value<0.001) and those with a tail tip dock (P value<0.001) were significantly more likely to have sustained at least one tail injury than spaniels docked by one-third, half or short combined (8.1 per cent, 73/900). Undocked spaniels were also more likely to have sustained at least one tail injury than spaniels with a tail tip dock (P value<0.001).

Only four HPRs were reported to have a tail tip dock, making comparison with this group difficult (Fig 4). However, undocked HPRs (39.1 per cent (25/64); P value<0.001) were significantly more likely to have sustained at least one tail injury than HPRs docked by one-third, half or short combined (4.4 per cent, 4/114).

Among other dog breeds (retrievers, pointer/setters, terriers and others) there were no statistically significant differences in the prevalence of tail injury in dogs with different tail lengths (Fig 5).

Owners of 299 dogs with a tail injury gave a detailed description of their dogs' 'worst tail injury' sustained during the survey period. A total of 103 of 2356 (4.4 per cent) dogs were reported to require veterinary treatment for this tail injury. Sixteen of 192 HPRs (8.3 per cent) and 68 of 1238 spaniels (5.5 per cent) received veterinary treatment for their worst tail injury. The vast majority of 'worst tail injuries' occurred during work or training (253, 84.6 per cent) rather than at home in the house (7, 2.3 per cent) or in a kennel (17, 5.7 per cent). The 253 work-related injuries occurred predominantly during 'rough shoots' (49.2 per cent of cases) or 'driven shoots' (40.5 per cent of

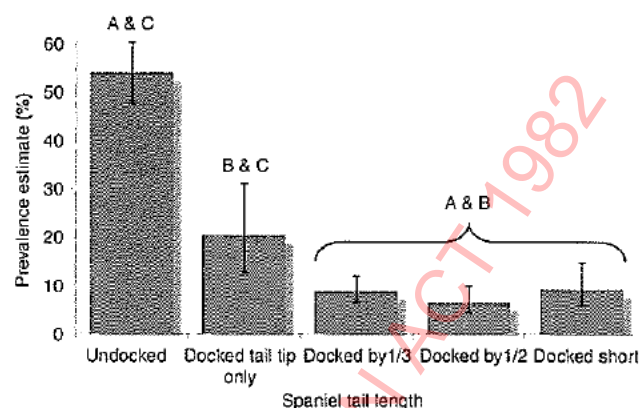


FIG 3: Prevalence of tail injury in spaniels by tail length during the 2010/2011 shooting season (showing 95% CIs). A, B & C indicate tail lengths for which the prevalence estimates are statistically significantly different (A: P value<0.001; B: P value<0.001; C: P value<0.001)

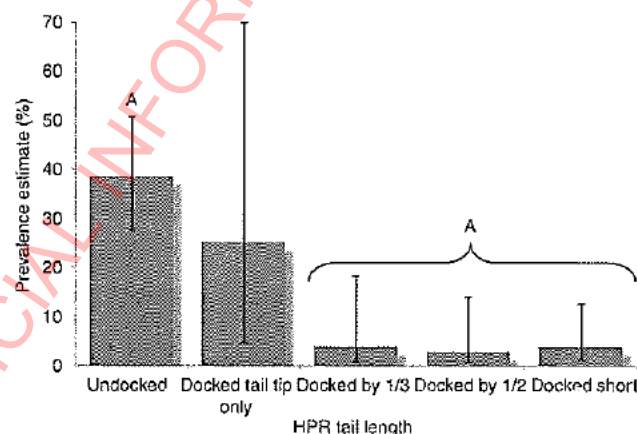


FIG 4: Prevalence of tail injury in hunt point retrievers by tail length during the 2010/2011 shooting season (showing 95% CIs). A indicates tail lengths for which the prevalence estimates are statistically significantly different (P value<0.001)

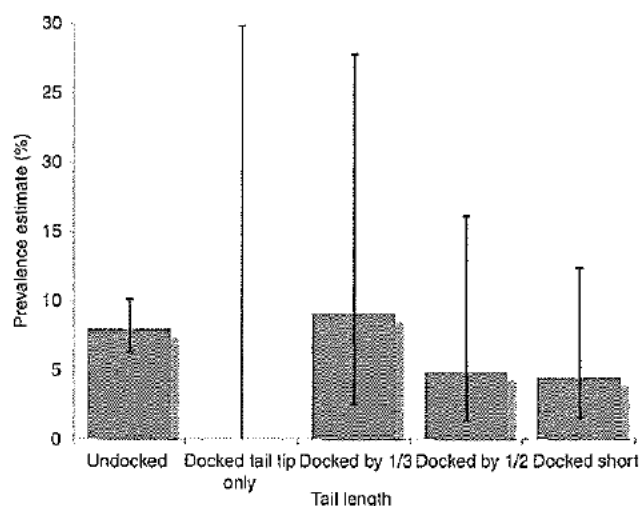


FIG 5: Prevalence of tail injury in all other working dogs, including retrievers, terriers and pointer/setters (ie, non-spaniel or hunt point retrievers) by tail length during the 2010/2011 shooting season (showing 95% CIs). There were no statistically significant differences in the prevalence of tail injury between different tail lengths

TABLE 2. Mixed effects multivariable logistic regression models describing the association between tail length and breed and the likelihood of tail injury in all working dogs (2320 of 2342 observations retained in final model), tail length and the likelihood of tail injury in spaniels (1219 of 1237 observations retained in final model), and tail length and the likelihood of tail injury in HPRs (187 of 187 observations retained in final model)

Outcome variable	Explanatory variable	OR	P value	95% CI
Tail injury in all working dogs	Tail length			
	Undocked (Reference)	1		
	Tail tip dock	0.18	<0.001	0.08 to 0.4
	Docked by one-third	0.05	<0.001	0.03 to 0.09
	Docked by half	0.04	<0.001	0.02 to 0.07
	Docked short	0.05	<0.001	0.03 to 0.1
	Breed			
	Retriever, pointer/setter, terrier or other (Reference)	1		
Tail injury in spaniels	HPR	10.9	<0.001	5.3 to 22.3
	Spaniel	22.1	<0.001	13.1 to 37.2
	Degree of clustering within respondent $Rho=0.36$		<0.001	
	Tail length			
	Undocked (Reference)	1		
	Tail tip dock	0.14	<0.001	0.06 to 0.3
	Docked by one-third	0.04	<0.001	0.02 to 0.08
	Docked by half	0.03	<0.001	0.01 to 0.06
Tail injury in HPRs	Docked short	0.04	<0.001	0.02 to 0.1
	Degree of clustering within respondent $Rho=0.37$		<0.001	
	Tail length			
	Undocked or tail tip dock (Reference)	1		
	Docked by one-third	0.04	0.014	0.003 to 0.5
	Docked by half	0.07	0.008	0.01 to 0.5
	Docked short	0.04	0.001	0.006 to 0.26
	Degree of clustering within respondent $Rho=0.39$		0.03	

HPR, hunt point retriever

cases) while dogs were working in 'cover' (44.3 per cent) or woodland (36.8 per cent).

Mixed effects multivariable models were built using tail injury as the outcome variable for all dogs, spaniels only, and HPRs only, using all variables listed in Table 1 as potential risk factors. The final mixed effects multivariable logistic regression models for each of these outcomes are shown in Table 2. None of the other potential explanatory variables included in Table 1 were significant in the final models.

Tail length was statistically significant in all models, with undocked tails being consistently more likely to be injured than tails that had been docked. However, the form of this variable that produced the best fitting model varied between models. When modelling tail injury as the outcome in either all dogs or just spaniels, a tail-tip dock was associated with a fivefold to sixfold reduction in the odds of tail injury (OR=0.18 and 0.14) compared with undocked dogs. Docking by one-third, half or short was associated with an approximately 20–25-fold reduction in the odds of tail injury (ORs between 0.03 and 0.05) compared with undocked dogs. There was no statistically significant difference in the odds of tail injury between dogs docked by one-third, half or short in any of the models. In HPRs there was no statistically significant difference in the odds of tail injury in dogs with undocked tails and those with a tail-tip dock. However, docking by one-third, half or short was associated with an approximately 15–25-fold reduction in the odds of tail injury (ORs between 0.04 and 0.07) compared with undocked dogs or dogs with a tail tip dock.

In the model including all dogs, breed was also significantly associated with the likelihood of tail injury, with HPRs and spaniels being 11 and 22 times more likely to have been reported to have sustained a tail injury, respectively compared with retrievers, pointer/setters, terriers or other breeds combined.

In all three models there was a statistically significant degree of clustering at the level of the respondent (see ρ values in Table 2). Inclusion of respondent as a random effect had a significant impact on the magnitude of some of the ORs included in final multivariable models. For example, in the single-level, multivariable model of tail injuries in all dogs the OR associated with spaniels was 11.8, but when accounting for clustering within respondent this OR almost doubled to 22.1 (Table 2). However, the inclusion of respondent as a random effect did not alter the variables actually included within any of the models.

Given the lack of evidence suggesting any reduction in the odds of tail injury in dogs with tails docked by half or shorter compared with dogs with tails docked by one-third, the number of dogs that would need to have their tails docked by one-third to avoid one tail injury was used to calculate the number needed to treat (NNT). The NNT was calculated from prevalence estimates and ORs (if available) and varied depending on the proportion of the litter assumed to become working dogs. Using a typical litter size of six puppies the NNT was calculated assuming that one, three or all six of the puppies became working dogs. To prevent one tail injury in all working breeds in one shooting season the NNT would be between five and 54. To prevent one tail injury in spaniels or HPRs in one shooting season the NNT would be between two and 18 (Table 3). To prevent one tail injury that required veterinary treatment in one shooting season in all working breeds one would need to dock the tails of between 18 and 108 puppies by one-third. To prevent one tail injury that required veterinary treatment in spaniels in one shooting season, between six and 36 puppies would need to have their tail docked by one-third.

A comparison of the initial 1005 responders (owning 2860 dogs) and 77 non-responders (owning 222 dogs) is provided in online supplementary Table S3. The prevalence of tail injury in different breeds of dogs with docked or undocked tails was not statistically significantly different between initial responders and non-responders (all P values>0.2). However, non-responders owned fewer spaniels but more terriers and pointers/setters and their dogs were more often housed outside. More owners in the non-responder group reported that the ban had changed their use of dogs and this group was also more likely to own a dog that was bred in Scotland.

Discussion

Tail injuries in working dogs occurred frequently, with 29 per cent of working dog owners responding to the survey reporting a tail injury in one or more of their dogs and 13.5 per cent of all dogs in the survey sustaining at least one tail injury during the shooting season covered by the survey. Prevalence estimates indicated that spaniels and HPRs were significantly more likely to have sustained a tail injury than dogs from other working breed groups. Spaniels and HPRs with undocked tails were reported to have been at greatest risk of tail injury, with 56.6 per cent of all undocked spaniels and 38.5 per cent of all undocked HPRs sustaining at least one tail injury during the 2010/2011 shooting season. These findings concur with the results of earlier studies

TABLE 3: The number of dogs needed to be docked by one-third (number needed to treat (NNT)) to avoid one tail injury in a working dog and the actual number of puppies and litters (assuming an average of six puppies per litter) that would need to be docked to ensure this number of docked dogs went into work

Prevention of	NNT	Actual number of puppies (and six-puppy litters) to dock to prevent one tail injury in a working dog, given: Number of litter that become working dogs		
		1	3	6
Any tail injury in all working breeds	9*	54 (9)	18 (3)	9 (2)
	5†	30 (5)	12 (2)	5 (1)
Any tail injury in spaniels	3*	18 (3)	6 (1)	3 (1)
	2†	12 (2)	6 (1)	2 (1)
Any tail injury in HPRs	3*	18 (3)	6 (1)	3 (1)
	3†	18 (3)	6 (1)	3 (1)
A tail injury requiring veterinary treatment in all working breeds	18*	108 (18)	36 (6)	18 (3)
A tail injury requiring veterinary treatment in spaniels	6*	36 (6)	12 (2)	6 (1)

For example, one would need to dock the tails of six spaniels to prevent one injury requiring veterinary treatment. If on average only one dog (from a typical litter of six puppies) goes on to work and be at risk of tail injury while working, one would need to dock the tails of six litters or 36 puppies to ensure a total of six docked dogs went into work. If one could guarantee all six puppies went on to work from all litters one would need to dock one litter or six puppies to ensure a total of six docked dogs went into work.

*Calculated from prevalence estimate

†Calculated from OR

HPR, hunt point retriever

which indicated that undocked working spaniels were at high risk (Houlton 2008, Diesel and others 2010) and docked pet dogs at significantly lower risk of sustaining a tail injury (Diesel and others 2010). It is nevertheless important to note that the prevalence estimates from previous work largely stem from veterinary practice data rather than owner-reported data. As such, previous estimates may have been representing the prevalence of more severe tail injury that required veterinary treatment rather than all tail injuries. It may also be significant that the injuries reported in the current study were owner reported rather than diagnosed by a veterinary surgeon, which again may lead to differences in prevalence estimates.

Logistic regression analysis indicated that breed and tail length were significantly associated with the likelihood of tail injury, with spaniels being 22 times and HPRs 11 times more likely to have sustained a tail injury compared with other breeds. Changes to the legislation on tail docking may therefore be most appropriately considered for individual breed groups rather than all working dogs. The difference in risk associated with breed groups is most likely due to the different conformation of tails and also the fact the breed groups work in very different terrains. This is highlighted by the fact that most 'worst tail injuries' occurred during 'rough' or 'driven shoots' while dogs were in 'cover' or 'woodland'.

Compared with possessing an undocked tail, a tail tip dock was associated with an approximately five-fold reduction in likelihood of tail injury and a dock of one-third or shorter was associated with an approximately 20-fold reduction in the likelihood of tail injury. There was no statistically significant difference in the likelihood of tail injury in dogs with tails docked by one-third, half or short, indicating no apparent added benefit in terms of protection from tail injury when docking shorter than by one-third.

A similar result was observed when modelling tail injury in working spaniels alone. Again there was no apparent benefit to docking shorter than by one-third. In HPRs there was no significant difference in the odds of tail injury in undocked and tail tip docked dogs. However, it is important to note that there were only four HPRs with a tail tip dock included in the survey, so the statistical power to identify a difference would have been limited. When comparing dogs with tails docked by one-third or more with undocked dogs or dogs with a tail tip dock, there was a similar 15–25-fold reduction in the odds of tail injury to that seen in the two previous models.

These results suggest a clear potential benefit to be gained from docking (at least by one-third) in spaniels and HPRs. The same cannot be said for other working breeds, but this may in part be due to the fact that some of the other working breeds were much less likely to be docked at all, therefore making statistical comparisons of the odds of tail injury within these breeds, given different tail lengths, difficult. For example, only 15 of 623 retrievers included in the survey were docked at all. Nevertheless, it may be appropriate to consider changes to the current legislation based on breed group rather than all working dogs.

An important aspect of this work is to remember that docking must be done very soon after birth, several months before the dog is at risk of sustaining a tail injury during work. There is therefore a need to account for the possibility that not all of a typical litter of working dog puppies will go on to work and be at risk of tail injury while working; hence the widely varying estimates of NNT when only one or all six of a litter go on to work. It would be useful to gather data from breeders on the exact number of a litter that do enter work to reduce the uncertainty around these estimates. The number of spaniels or HPRs that would need to be docked by one-third to avoid one tail injury over one shooting season would be between two and 18, depending on how many of a litter would become working dogs. The NNT to avoid one tail injury that required veterinary treatment in a shooting season was between six and 36 for spaniels or between 18 and 108 for all working dogs. These NNT estimates are substantially lower than the approximately 500 described by Diesel and others (2010), which included far fewer working dogs and many more pet dogs. It is important to note that these NNT calculations are based on the effect of docking on tail injury in any one shooting season. Any benefit would be likely to be sustained for the number of years that the dog was used for work. Given the fact that the current study was specifically focused on working dogs, the dogs most at risk of tail injury and most affected by the ban on tail docking, the authors suggest that the figures calculated here are much more likely to represent the likely impact should legislation be altered to allow docking in spaniels and HPRs or indeed all working breeds of dog.

Where tail docking is permitted, best practice clinical procedures (eg, as described by Schoen and Sweet 2009) should ensure that tail docking of puppies is humane and safe. There are limited scientific data regarding pain perception of puppies at docking. More specifically there is no information on the likely difference in pain perception between docking to different lengths. However, Noonan and others (1996) did indicate stress and pain responses during and after tail docking in dogs and the assumption that performing procedures at younger ages results in less pain has been challenged (Taylor and others 2001). Additionally, very little is known about the effects of tail amputation when performed later on in life. However, permanent neuroma formation has been described in six dogs (mainly cocker spaniels) after tail amputation at one to four years old (Cross and Carr 1990). Intuitively one would hypothesise that repeated tail tip injuries, followed by an amputation as an adult, would be more painful than the pain of being docked as a puppy. However, it is important to remember that docking as a puppy does not entirely remove the risk of subsequent tail injury and gun dog owners should also be encouraged to reduce the risk of tail injury by, for example, ensuring dogs are housed in suitable kennels and if feasible selecting less hazardous areas for a shoot or field trial. It is recognised that the selection of the area for a shoot is difficult to manage. However, the fact that 44.3 per cent and 36.8 per cent of 'worst tail injuries' were reported to have occurred while working in 'cover' or woodland, respectively may help owners with dogs prone to tail injury decide which shoots or field trials to attend.

An important limitation of this study was the fact that the survey was publicised through country sports associations which were clearly critical of the complete tail docking ban in the past and proactive in their attempts to allow preventative tail docking in working gundogs and terriers (Petition PE1230 to the Scottish parliament). A bias toward survey participants opposed to the tail docking ban for working gundogs is therefore possible, which may have increased the prevalence of tail injuries reported in this survey. However, country sports organisations are the only representation for owners of

working gundogs and terriers and the target population of working dog owners could not have been reached by any other means.

Participation in the survey was also surprisingly low given that the tail docking legislation has been hotly debated. The survey was advertised directly to approximately 4500 members of the Scottish arm of BASC who own working dogs, 8000 SCA and 5000 SGA members, the latter including 1200 gamekeepers nearly all of whom were dog owners. Yet, only 1005 owners of working gundogs and terriers participated in the survey and it is impossible to know whether dog owners did not take part because they were unaware of the survey, or did not have the motivation to participate due to lack of time, internet access or a lack of tail-related problems. The low response rate may have resulted in an overestimation of the risk of injury if respondents with dogs that had tail injury were more motivated to take part. Nevertheless, it is worth noting that estimates of the prevalence of tail injury were not significantly different between initial responders and non-responders.

The comparison with 'non-responders' did show bias towards spaniels and HPRs, potentially because some owners believed that the survey was only for these particular breeds. This may have increased the overall prevalence of tail injuries in all working dogs as spaniels and HPRs were the breed groups most likely to sustain tail injuries. However, within-breed group prevalence estimates would remain unaffected by over representations of certain breeds among the initial respondents, and as such, the authors believe that the within-breed prevalence estimates are more useful than broad estimates for all working dogs.

It is also important to acknowledge that the non-responder group was not entirely representative of the target population for the survey. The group largely included professionals such as game keepers and as such would have represented a subgroup of the target population. This in itself may have contributed to the slight differences in the proportions of different working breeds owned by responders and non-responders.

A further limitation of this work is the lack of information regarding actual time at risk. In other words, given the retrospective manner of the work, it was not possible to record accurate information regarding the number of shoots or hours spent working by dogs owned by respondents. A cohort study was attempted as part of this work to try to address this limitation. However, recruitment and compliance were so poor that statistical power was significantly compromised, rendering analysis of results inappropriate.

Accepting the potential for respondent bias, the authors contend that this work provides the best available evidence to date on which to base a consultation for changes to the legislation on tail docking in working dogs in Scotland. The work clearly indicated that working spaniels and HPRs were at increased risk of sustaining tail injuries, especially if undocked. In addition, the work shows that docking the tails of HPRs and spaniels by one-third would significantly decrease the risk of tail injury sustained while working in these breeds.

Acknowledgements

The authors would like to thank all members of the steering committee for their advice and assistance, those who tested the survey before it became active, and all participants in the study. Funding for this work was provided by the Scottish Government.

- Additional material is published online only. To view please visit the journal online (<http://dx.doi.org/10.1136/vr-2013-102041>)

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CrossMark

Survey of tail injuries sustained by working gundogs and terriers in Scotland

R. Lederer, D. Bennett and T. Parkin

Veterinary Record 2014 174: 451 originally published online April 4, 2014
doi: 10.1136/vr.102041

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✓ (238)

From: bailey ingham <§ 9(2)(a)>
Sent: Thursday, 19 May 2016 6:34 p.m.
To: Animal Welfare Submissions

As is the case with many New Zealanders I am greatly concerned at the poor animal welfare standards of this country .Factory farming /battery hens/ cruelty to bobby calves and now hundreds of fish being dumped .The list goes on and obviously profit comes at any cost .Where are the morals and ethics gone ?Certainly under the recent watch of the Department under the current government there are no standards /just excuses and lip service .

As a result I have no respect whatsoever for a ministry who ~pretends to have a robust animal welfare division~ .Prove that you have some backbone and ban factory farming in all forms

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From: Deborah Robinson <s9(2)(a)>
Sent: Thursday, 19 May 2016 6:38 p.m.
To: Animal Welfare Submissions
Subject: Factory farming, Rodeos, Dogs on permanent chains, Circus animals, Increased funding to the SPCA to monitor and police animal welfare

*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 ask that dog owners be legally required to provide shelter, food, water, exercise and company. I live in Manurewa and it breaks my heart to see so many dogs permanently chained with no access to shelter or company.

I also ask that the body given responsibility for policing animal welfare, the SPCA, be funded to have adequate numbers of rescue, urgent response and prosecution teams.

Please pass a law requiring that farmers provide shelter and shade for their livestock. So many animals are quietly suffering in scorching sun or harsh winter weather. They still continue to live and grow, producing meat and wool, so their basic needs for comfort are not met. They deserve more from us.

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

In confidence that you will be the voice for animals in New Zealand,

I am

Yours sincerely

Deborah Robinson

From: Brian Currey <s 9(2)(a)>
Sent: Thursday, 19 May 2016 6:14 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations

To Whom it may concern,
I have been training dogs for 20 plus years.
I have titled four dogs in Schutzhund/IPO.
I won the World Union of Bouvier Championship in 2007.
It is my understanding that New Zealand is considering banning the use of the prong collar. With out going into considerable detail in this email, a prong collar is a safe and humane tool in managing and training behaviour in dogs. It is the equivalent to power steering on a car, and is a kind tool in dog training.

Brian Currey
Re/max Realty Professionals
s 9(2)(a)

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✓ (241)

Out of Scope

From: William Sandle <s9(2)(a)>
Sent: Thursday, 19 May 2016 5:22 p.m.
To: Animal Welfare Submissions
Subject: Animal Welfare Submission Otaika Valley
Attachments: otv submission.pdf

Hi there,

Please see attached my submission.

Apologies for the delay I had trouble with my scanner.

Regards

William



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Otaika Valley Free Range Eggs Ltd
PO Box 616
Rotorua 3040
Ph. 021 144 4485

19th May 2016

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

To Whom It May Concern,

Submission on Animal Welfare Regulations

I represent Otaika Valley Free Range Eggs Ltd which has a Free Range Layer Hen farm South of Whangarei.

My submission relates to Proposed Animal Welfare Regulations (Care & Conduct and Surgical & Pain Procedures)

section 19. Layer Hens – Housing and equipment design subsection Barns (vii)

"All hens must have access to good quality friable litter at all times to allow them to scratch and forage."

In my view the above section is incorrect due to the words "at all times". This should be removed in favour of "during daylight hours". I suggest this on the grounds that birds are non-nocturnal and roost on perches and do not use the litter at night. Further to this the "at all times" requirement is irrelevant to use of the litter.

Yours faithfully

William Sandle

Out of Scope

From: Raymond Artist <s 9(2)(a)>
Sent: Thursday, 19 May 2016 5:12 p.m.
To: Animal Welfare Submissions
Subject: Submission attached.
Attachments: CCE19016.pdf



Kelly Te Reo

NZKC Registered Breeder

Phone s 9(2)(a) s 9(2)(a)
Fax s 9(2)(a) s 9(2)(a)
Mobile s 9(2)(a) s 9(2)(a)
Email s 9(2)(a) s 9(2)(a)

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Animal welfare proposed regulations feedback submission form

Your name: Kelly Tekeo

Your organisation (if applicable): Supported by NZ Council of Docked Breeds

Your contact details: _____

- NZKC Registered Breeder.

Your feedback: I am an owner, breeder and exhibitor of a traditionally docked breed. I wish to state that I have issue with restrictions being placed on the right of breeders ~~and~~ to safely and humanly remove dew claws and band the tails of 2-3 day old pups. I have been practising this for all of my 12 years in my hobby and I have never once had an issue arise from the act of banding or dew claw removal. The one time we suffered a small infection at the site of tail removal was when it had been performed by a vet who cut and stitched the tail. Banding by an accredited practitioner has NEVER resulted in any issues or ~~and~~ dress for the pups. I would like to think that peoples right to choose how to continue in their pursuit of pure bred, healthy and happy dogs will not be taken away.

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

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

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

Submissions close 5pm 19 May 2016.

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Ministry for Primary Industries
Manatū Ahu Matua



Animal welfare proposed regulations feedback submission form

Your name: Lorraine Bolvin

Your organisation (if applicable): _____

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

Your feedback: Dew Claw Removal - I do not support the proposed regulations to only remove dew claws for therapeutic reasons. Dew claw removal should still be able to be carried out but I agree it should be carried out by a Vet or by an accredited person under a quality assurance scheme. Dew claw removal should still be able to be carried out on puppies 4 days or younger by an accredited person, as this is the least traumatic time for removal and involves minimal pain and distress, as the nervous system is not fully developed. Performed correctly, there is NO cutting through bone. Dew claw removal prevents later unnecessary injury and pain. Prohibiting the removal of dew claws (under for therapeutic reasons) will be difficult to enforce.

Tail Docking - I agree Tail Docking should be done by a Vet but the 'Quality Assurance Scheme' under the 'Dog's Code of Welfare 2010' - should remain to allow tail docking of puppies 4 days or younger by Accredited Tail Dockers. This is already an approved procedure that Parliament approved and can be managed still under the Code of Welfare. Performed correctly, it can reduce the risk of becoming 'fly blow' with certain breeds.

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

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

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Ministry for Primary Industries
Manatū Ahu Matua



Animal welfare proposed regulations feedback submission form

Your name: Cindy Case

Your organisation (if applicable): Cindys Canine Grooming

Your contact details: [REDACTED]

Your feedback: New Claw Removal - I do not support the proposed regulations to only remove New Claws for therapeutic reasons. New Claw removal should still be able to be carried out but I agree it should be carried out by a Vet or by an accredited person under a quality assurance scheme. New Claw Removal should still be able to be carried out on puppies 4 days or younger by an accredited person, as this is the least traumatic time for removal and involves minimal pain and distress as the nervous system is not fully developed. Performed correctly there is NO cutting through bone. New Claw removal prevents later unnecessary injury and pain. Prohibiting the removal of New Claws (unless for therapeutic reasons) will be difficult to enforce.

Tail Docking - I agree Tail Docking should be done by a Vet but the 'Quality Assurance Scheme' under the 'Dogs Code of Welfare 2010' should remain to allow tail docking of puppies 4 days or younger by Accredited Tail Dockers. This is already an approval procedure that Pachamut approved and can be managed still under the Code of Welfare. Performed correctly, it can reduce the risk of becoming 'fly blown' with certain breeds.

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

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

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Ministry for Primary Industries
Manatū Ahu Matua



Animal welfare proposed regulations feedback submission form

Your name: Steven Rondel

Your organisation (if applicable):

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

Your feedback: Dew Claw Removal - I do not support the proposed regulations to only remove Dew Claws for therapeutic reasons. Dew Claw removal should still be able to be carried out but I agree it should be carried out by a Vet or by an accredited person under a quality assurance scheme. Dew Claw Removal should still be able to be carried out on puppies 4 days or younger by an accredited person, as this is the least traumatic time for removal and involves minimal pain and distress as the nervous system is not fully developed. Performed correctly there is NO cutting through bone. Dew Claw removal prevents later unnecessary injury and pain. Prohibiting the removal of Dew Claws (unless for therapeutic reasons) will be difficult to enforce.

Tail Docking - I agree Tail Docking should be done by a Vet but the 'Quality Assurance Scheme' under the 'Code of Welfare 2010' should remain to allow tail docking of puppies 4 days or younger by Accredited Tail Dockers. This is already an approved procedure that Parliament approved and can be managed still under the Code of Welfare. Performed correctly, it can reduce the risk of becoming 'fly blown' with certain breeds.

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

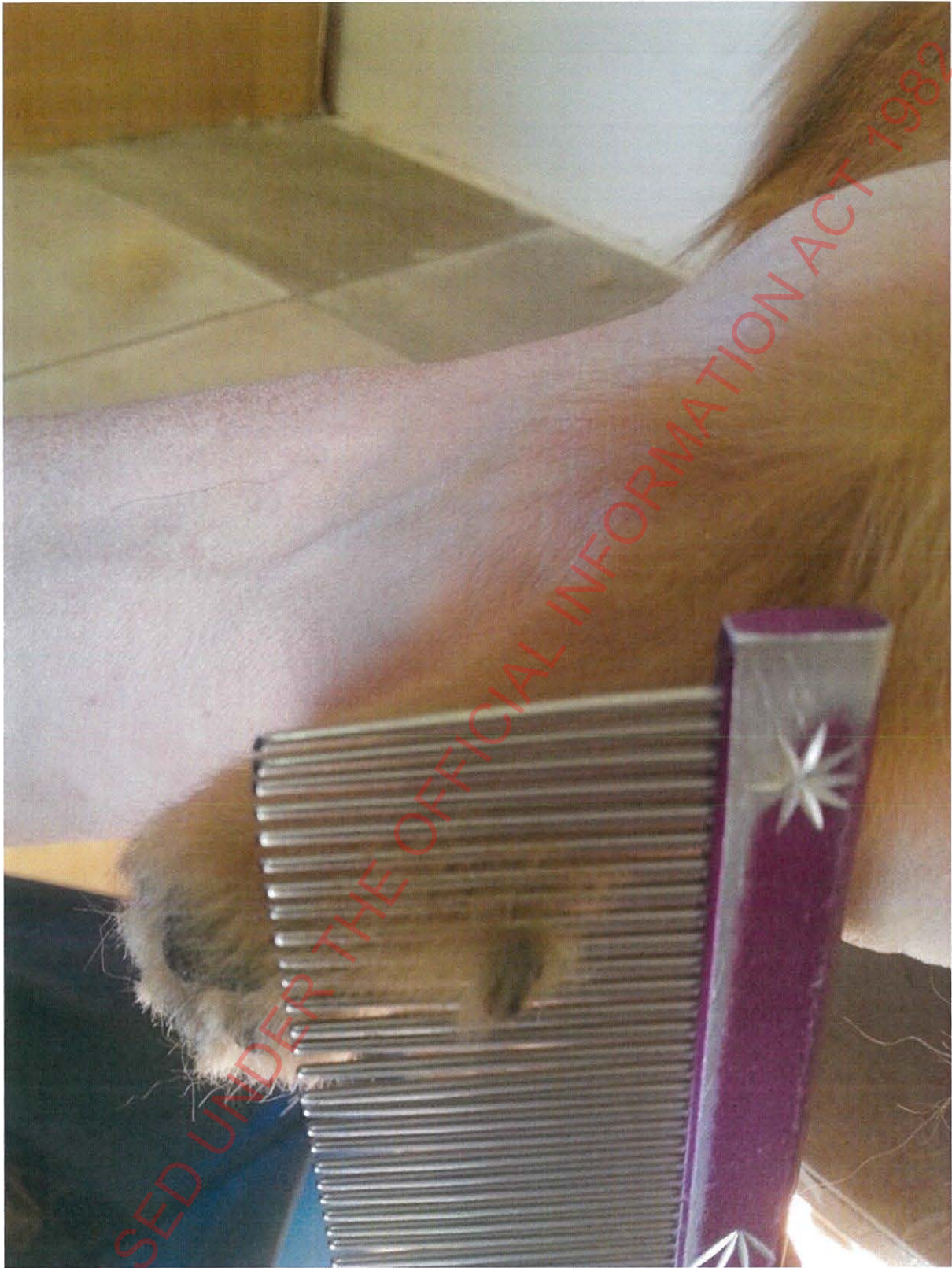
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From: Anneline Thorpe <§ 9(2)(a)>
Sent: Thursday, 19 May 2016 5:01 p.m.
To: Animal Welfare Submissions
Subject: Regulations

Ban cages, or at least make big enough to exercise in freely.

Give shade to farm animals trees required.

Independent inspector required, chosen by safe .

Anneline Thorpe

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From: Lynn Charlton <s 9(2)(a)>
Sent: Thursday, 19 May 2016 4:58 p.m.
To: Animal Welfare Submissions
Subject: Anti Rodeo Action NZ submission on rodeo regulations
Attachments: ARANZ submission to MPI and NAWAC suggesting regulations for rodeo.doc;
RODEO - ARANZ findings on 2015 2016 rodeo season for NAWAC and MPI April
2016.doc; IMG_7917.JPG; IMG_9275.JPG; IMG_8527.JPG

Follow Up Flag: Follow up
Flag Status: Flagged

Dear MPI

Please find attached Anti Rodeo Action NZ's submission suggesting regulations on rodeo.

Please find attached a report to NAWAC on our findings over the 2015/16 rodeo season.

Also attached are 3 photographs taken at Opotiki, Warkworth and Waikato demonstrating animal distress.

Yours sincerely
Lynn Charlton
Anti Rodeo Action NZ

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19 May 2016

Ministry for Primary Industries
National Animal Welfare Advisory Committee

ANTI RODEO ACTION NZ

SUBMISSION TO THE MINISTRY FOR PRIMARY
INDUSTRIES AND THE NATIONAL ANIMAL
WELFARE ADVISORY COMMITTEE
SUGGESTING REGULATIONS FOR RODEO IN
THE EVENT A FULL BAN ON RODEO IS NOT
IMPLEMENTED BY THE GOVERNMENT IN 2016

Context and background

In the 2012/13 rodeo season I began investigating rodeo with the intention of writing an article, and attended rodeos at Warkworth and Huntly. I filmed and photographed and listened to the announcer's claims of high animal welfare standards, and to his interpretation of animal behaviours – the animals were having fun. The music and atmosphere was relaxed and convivial, helping support the lulling commentary. Then I started focusing on what the animals were saying via their body language and behaviour: Their story was nothing like that being portrayed.

The following year five other animal advocates joined me at Huntly rodeo. We filmed and photographed, and I laid a complaint with MPI. MPI took this seriously, with the result that organisers, a contractor, and a contestant, a school boy, received formal warnings under the Animal Welfare Act 1999. The Huntly rodeo organisers decided to voluntarily shut down, admitting they could not guarantee the same thing would not happen again.

The following season, 2014/15, our group expanded and together we investigated 8 North Island rodeos under the newly issued Rodeo Code of Welfare 2014. We found dozens of breaches of the Code at every rodeo, that indeed, flouting animal welfare requirements is systemic within rodeo, despite claims to the contrary, and laid complaints with MPI. The result of this was that MPI provided education to rodeo clubs on seven animal welfare issues. Footage taken during our investigation was shown on television news items – some with warnings graphic images would upset some viewers. I published articles in the Auckland SPCA Animals' Voice magazine and in newspapers.

In 2015 we began our Anti Rodeo Action NZ facebook page to provide evidence on the treatment of animals at rodeos for the public. A South Island animal advocacy group decided they wanted to assist, so joined us. Another group had also attended rodeos with us. A fourth group sprang up to lead protests outside rodeos and this year have covered a number of rodeos and gained media coverage using graphic photographs of what rodeo animals experience.

During 2015, SPCA NZ, SAFE and Farmwatch came together to issue a petition to ban rodeo. This was a first effort between these groups. While the NZ public knew and still know, very little about rodeo, almost 63,000 signatures were obtained.

In the next few days, Anti Rodeo Action NZ will be submitting footage and photographs taken at six North Island rodeos taken during the 2015/16 season showing the treatment of animals and breaches of the Rodeo Code of Welfare. The South Island animal advocacy group will also be submitting footage of Code breaches at four South Island rodeos. A third group also have footage to submit from the North Island.

Findings from this season show again, that breaches of the Rodeo Code of Welfare 2014 is systemic within rodeo.

We feel we are uniquely positioned, after attending many rodeos and studying rodeo footage for literally thousands of hours over the last four seasons, to make the following suggestions for regulations around rodeo if a ban – being considered by the NZ government at the moment - is not implemented at this stage.

Anti Rodeo Action NZ's first preference is that a total ban on rodeo is put in place. Rodeo cannot be conducted in a humane way as it relies upon distressing and harming animals for staged "wild" shows.

SUGGESTIONS FOR REGULATIONS TO ASSIST ANIMAL WELFARE AT RODEOS:

- 1. Regulate to increase the size of chutes so every animal, no matter how large, is able to express and exhibit normal behaviour and go down in the chute if they need to do so to manage physiological and psychological arousal i.e. terror.**

In all events, the size of the chute is designed to tightly confine animals. This currently works to thwart Code of Welfare requirements that animals that go down in the chute are released.

Minimum Standard No.4 (f): Any animal that becomes excessively excited, goes down in the chute, or attempts to jump out of the chute in a manner that may cause it to injure itself must be released.

Many animals do not go down in the chute purely because they cannot. Many put their forelegs down but the chute wall behind them prevents them lowering their rump. The chute sizes at Waikato rodeo is a prime example of this. The announcer has told the crowd that these chutes are small. Footage from this season shows some of the larger bulls are positioned between two chutes; such is the length of the animal. The chutes are also too narrow for these bulls, preventing the competitor from getting their leg down the side of the bull between the animal and the chute railings. A wooden pole is then rammed down the side of the animal to force space for the rider to put his leg down. This must cause stress, and possibly pain to the bull. The huge animal cannot show his fear by going down on the ground in the chute, and activating the protection of the Code to release him (were clubs to adhere to the Code): *Minimum Standard No.4 (f): Any animal that becomes excessively excited, goes down in the chute, or attempts to jump out of the chute in a manner that may cause it to injure itself must be released.*

It could be regulated that all chute sizes are increased to allow the largest of animals to go down on the ground should they feel the need to do so to manage their terror. A regulation in this area would back up the Code Minimum Standard No.4 (f).

- 2. Regulate to limit travelling distances for animals sourced for rodeo**

Animals travel vast distances, packed in trucks, on motorways and country roads predominantly during summer heat, humidity and rain to be used for these entertainment shows. This likens rodeo to a travelling circus. Some animals are carted around over several days, moving from town to town, paddock to paddock, pen to pen, all in strange and new surroundings, while facing more and more unfamiliar humans. An example of this over the 2015/16 season was a bull riding outfit that transported bulls from Feilding to 4 rodeos in 4 days at Gisborne, Opotiki, Rerewhakaaitu and Taupo. Bulls are also transported from Feilding to Warkworth in the north, and possibly beyond.

Footage shows bulls being given electric shocks from the top of a truck i.e. from above, at Warkworth rodeo at the end of rodeo days. Managing large animals is always challenging, and managing large stressed, exhausted animals that have been on the road for many days, that have been ridden, subjected to flankstraps, spurring and electric shocks is a phenomenal

stress loading on these animals. While animals may travel on trucks to slaughter and be subject to electric shocks to facilitate this prior to death, death then ends the experience. Some rodeo animals are subjected to this over consecutive days, week after week, and over months of the rodeo season, purely to entertain humans.

Regulating how far animals can travel, and over what time period would improve animal welfare by at least reducing the vast travelling distances and allowing for some recovery time between travelling and the events. For example, it could be regulated that animals must be sourced from the local area, say within a 30km radius and must be brought to the rodeo grounds 2 days prior to the event to allow them to recover from the stress of travelling, to allow sleep, feeding, watering and thermoregulation recovery, physiological and psychological reduction in arousal and adaptation to the new surroundings before imposing more stress on them during a rodeo.

3. Regulate to allow post rodeo recovery before animals can be transported back to their home paddock.

Regulations could be put in place to prohibit the removal and transportation of animals used at the rodeo until the following day, when they have had the overnight opportunity to recover, to sleep, to thermoregulate via a lowering of stress and via food and water and some freedom in a paddock before being transported back to their home paddock. Further travelling and confining of already exhausted and stressed animals immediately after they have been subjected to rodeo is pushing them beyond reasonable limits.

4. Regulate that animals must not be used on consecutive days for rodeo.

Regulations could be put in place that animals may be used at one rodeo only, that the travelling distances regulations must be met, and the animals allowed proper recovery before going on to another rodeo. This would mean no animals could be used at 4 rodeos over 4 consecutive days, or even over 2 days if travelling was involved to move animals to another town or location.

5. Regulate to prohibit the use of flankstraps, electric shocks and spurring.

Regulations could be put in place to disallow the use of these instruments to torture rodeo animals. These implements are used for the purpose of goading, aggravating, and inducing fear and pain, and inflict harm on animals merely for perverted fun for some.

6. Regulate to prohibit the use of flankstraps and the spurring of calves ridden by children (if these are not prohibited by regulation anyway).

Regulations could be put in place to disallow flankstraps and spurring of calves by children. The Rodeo Code of Welfare 2014 refers to spurring of horses, but makes no mention of the spurring of calves by children (or the spurring of steers and bulls) from what we could see, so it may already be that all ages of cattle should not be spurred, though they are, at every rodeo. We have made NAWAC aware of this (please see attached report).

7. Regulate to limit how many people are permitted to stand above the bucking chutes while animals are in the chutes.

Regulations could be put in place to limit human presence to a necessary few that have already delegated tasks in managing animals standing in chutes.

At present, anyone and everyone involved crowds around the chutes above trapped animals. MPI have also commented that there are so many people involved it is hard to see what is going on. This must stress out trapped animals, as there is a lot of movement and people with no actual task, including children, can be seen leaning over to slap an animal or in some way aggravate it. Footage shows such crowding that there is no room to move or make room for one additional person. As this is happening across a line-up of between six and ten bucking chutes, it means literally dozens of people are standing above already stressed and fearful animals, some already rearing, or trying to leap out of the chutes, bucking in the chutes or trying to collapse on the ground. The stress of being around crowds of people, in close proximity, and other already frightened animals, as well as loud music, adds to the intolerable situation for many animals.

8. Regulate to prohibit anyone under the age of 15 from standing above bucking chutes.

Regulations could be put in place to restrict the age of children that are permitted near animals standing in chutes. If calf riding is still permitted for younger children, that these children approach the chute when it is their turn to ride only, and then move away afterwards. At Waikato rodeo this year, a boy of about 9 or 10, unsupervised as most children behind the chutes are, due to their parents being busy, was seen randomly kicking animals as they went past. Regulations restricting entry and access to chutes to more mature ages would reduce such occurrences and reduce the stress on animals.

9. Regulate that no animal is permitted to be used more than once at any rodeo.

The extreme stress animals are subjected to for rodeo entertainment is not something any animal should have to endure more than once on any given day. Science shows whether or not animals are contract stock or non-contract stock makes no difference to their stress levels.

10. Regulate that animals that refuse to exit the chutes (are immobilised by fear) must be released and not used again that day, or in future rodeos or practises.

Currently, these animals receive electric shocks and spurring to force them to exit the chute, or are hauled out by their head gear, as is the case with horses.

11. Regulate that no animal in the arena is subjected to any experience that causes animals to open their mouths (a sign of severe pain and distress) in the arena during the event.

Currently, it is not unusual to see horses, while wearing a flankstrap, and being kicked in the shoulders and torso with metal spurs, thrashing, twisting and bucking with open mouths. This is a sign of pain and fear in equines. Even when the rider has fallen off, some horses continue bucking with open mouths. (See attached photograph).

Bulls frequently open their mouths, splashing sufficient mucus and saliva to show up on photographs. These animals are hugely stressed.

It would be the responsibility of the competitor to make sure they did not induce this stress response in any animal they rode.

12. Regulate that ropes must not trail on the ground after the rider has fallen off bucking horses.

Currently the halter rope on a horse's head trails the ground once the rider has fallen off in the arena. Horses can and do stand on this rope, causing them to stumble. Given that they are always highly distressed at this point, and often thrashing and bucking even without the rider, this makes for a very dangerous practise. Some horses have broken their necks standing on these ropes. Last season we provided a statement from a woman that witnessed this as a child. Any rider knows ropes and reins dangling on the ground are a hazard for horses.

13. Regulate that music cannot be loud and must be below a certain threshold so as not to further stress already stressed out animals.

INDIVIDUAL EVENTS

ROPE AND TIE (CALF ROPING)

Our preference is that calves are not used at all in rodeos. However, if they do continue to be used, that regulations be put in place to include the following:

14. Regulate to prohibit handlers from standing behind calves, or making physical contact with calves while they are in the release chute.

Currently, handlers twist the tails of calves, ram their bodies into the calves, slap, pinch, punch and prevent the terrified baby animals from going down on the ground in fear, which would then activate the Rodeo Code of Welfare *Minimum Standard No. 4 (f): Any animal that becomes excessively excited, goes down in the chute, or attempts to jump out of the chute in a manner that may cause it to injure itself must be released* (if clubs were adhering to it). Unfortunately, as our investigations over four seasons have shown, clubs do not abide by the Code. The presence of a human behind the calf serves the purpose of goading the animal so they will bolt at speed out of the chute to be chased and roped. As the organiser of Huntly rodeo told me, "They want to get away from those pesky humans". The presence of a human thwarts the Code of Welfare as handlers prevent calves from going down in the chute due to being positioned at their rear end.

15. Regulate that calves in the release chute for Rope and Tie must not be handled/touched while waiting to be used in the event. Calves to be permitted to stand quietly, unmolested.

Currently, handlers on either side of the Rope and Tie release chute pinch, punch, slap, push, clip over the head and pull the ears of calves waiting to be chased and roped in Rope and Tie. As above, this is done to wind the calf up, induce fear and activate the flight response when the gate is opened. Footage shows calves are banged into the rails, are knocked from side to side in the chute, their faces and heads moving around and hitting the chute gate. Having

handlers at either side of them, as well as behind, all having a go at them, induces great fear in these young animals. These are not animal welfare strategies, but strategies to deliberately stimulate fear.

16. Regulate to increase chute size to allow every calf used in Rope and Tie the opportunity to go down in the chute if they are overwhelmed with fear and needed to (as above with chute size suggestion). At this point, the Code would be activated: *Minimum Standard No.4 (f): Any animal that becomes excessively excited, goes down in the chute, or attempts to jump out of the chute in a manner that may cause it to injure itself must be released.* Calves that were not severely stressed would not lie down in the chute but could take part in the event.

17. Regulate that Rope and Tie stops at exactly 30 seconds, regardless of where the competitor has got to in the event.

Currently, competitors that have failed the event anyway, take as long as they like to complete calf roping. It is used as a practise opportunity in front of a crowd. This inevitably takes the time to well over the time allowed by *Minimum Standard No.9 (f) The event must not exceed 30 seconds from the release of the calf from the chute* so is therefore a breach of the Code anyway. Regulating that at 30 seconds the competitor must immediately cease his activity would reduce the stress on many calves that may have just been caught and are yet to be thrown to the ground, tied and left lying bound and breathing in dirt with their hearts pounding.

CALF RIDING

18. Regulate to prohibit spurring of calves by children.

Currently children as young as 9 or 10 are wearing spurs and spurring calves, gaining extra points for doing so. Obviously, these animals are young and frightened and removing spurring (if it was ever permitted anyway – the Code does not mention it) would be a good animal welfare strategy.

19. Regulate that calves must not be kicked by children during calf riding, with or without spurs (should spurs not be prohibited in calf riding).

20. Regulate to prohibit the use of flankstraps for calf riding (if they are not already prohibited).

Bulls break their backs in rodeo due to overextending, as has happened in the last couple of years. Calves also overextend their backs (see attached photograph). Flankstraps cause calves to continue bucking repeatedly after the child has fallen off.

21. Regulate to allow only one adult handler, over the age of 18, to be present in the bucking chute with calves that are being prepared to be ridden.

Currently, two or three handlers, sometimes all youths, get in to the bucking chute with the calf and the child competitor. This is done to enable handlers to defy the Code of Welfare *Minimum Standard No.4 (f): Any animal that becomes excessively excited, goes down in the chute, or attempts to jump out of the chute in a manner that may cause it to injure itself must*

be released. These handlers haul calves that have dropped to the ground in terror back on to their feet and/or use their knees and legs to prevent the calf dropping to the ground while they are trying to do so. Calves that go down on the ground must of course be released, as per the Code.

STEER WRESTLING

- 22. Regulate as above, for Rope and Tie – steers used for steer wrestling come out of the same chute as the Rope and Tie calves, and not out of the bucking chutes.**
- 23. Regulate that steer wrestling does not including twisting the necks of steers. The sheer terror these animals must feel when their necks are twisted 180 degrees is beyond comprehension.**

Footage and photographs of steers taken over the last four seasons show the most appalling scenes of the treatment of steers at rodeos. (See attached photograph).

TEAM ROPING

- 24. Regulate as above, for Rope and Tie and Steer Wrestling – steers used for Team Roping come out of the same chute as these other animals, and not out of the bucking chutes.**
- 25. Regulate that false horns cannot be used in Team Roping.**

This last season we have noticed a number of steers have been very stressed wearing these fake horns over their heads and faces. Strapping the heads and faces of animals into close-fitting costumes for entertainment shows is cruel and induces fear. Several steer have become frozen in the arena during Team Roping, some with their heads down and others with their heads bent to the side. Handlers have had to go to their assistance and remove the fake horns from the immobilised animal before they could move. During the event, the animal's back legs are pulled out from under them while they are wearing these artificial horns, confusing and frightening animals that are already struggling with what is happening to their head.

BAREBACK AND SADDLEBACK BRONC RIDING

- 26. Regulate that flankstraps, spurring and electric shocks must not be used on horses (as above).**
- 27. Regulate that horses must not be kicked in the shoulders (with or without spurs).**

BULL and STEER RIDING

- 28. Regulate to prohibit flankstraps, spurring and use of electric shocks on bulls (as above).**
- 29. Regulate that bulls must not be kicked in the shoulders (with or without spurs).**

Dear John Hellstrom, Chair, NAWAC,

Anti-Rodeo Action NZ has completed another investigation showing the failure of rodeo clubs to comply with the Minimum Standards of the Rodeo Code of Welfare 2014. MPI will soon receive filmed and photographed evidence from North and South Island rodeos showing non-compliance with the Code is systemic across rodeo. Fundamental requirements are breached again and again and the welfare of animals seriously compromised as our evidence-based investigation will show. We believe rodeo clubs are completely out of control, a law unto themselves, that those involved are not fit and proper persons to be holding these events and that rodeo must stop immediately.

We understand NAWAC “continues to hold welfare concerns for the use of animals in rodeos, and in particular, events using calves,” (p14 Code of Welfare). We applaud and share this concern, and wish to assist NAWAC and MPI by providing information from observation, footage and photographs from our own investigations into rodeo. We began investigating rodeo during the 2012/13 season and found breaches of the Rodeo Code of Welfare were, and continue to be, systemic within NZ rodeo.

This year is our third year of making complaints to MPI in regard to rodeo. This year once again, we have filmed and photographed at various rodeos and will shortly be lodging complaints with MPI.

Last year, prior to our complaints to MPI we consulted Gillian Coumbe Q.C. who had this to say in regard to our footage:

“You appear to have supporting evidence of non-compliance with the minimum standards in the Rodeo Code of Welfare. I am aware that a breach of the Code is not, of itself, an offence under the current law. However, if there are in fact breaches of the Code they will very likely, especially taken together, amount to prima facie evidence of conduct which is also in breach of specific provisions of the Animal Welfare Act 1999, and may therefore constitute offences committed under that Act. For example, the simple “ill-treatment” of an animal is an offence under s 29(a) of the Act. “Ill-treatment” is defined in s 2(1) as including causing unnecessary or unreasonable distress. Usually proof of compliance with a code is a defence to what would otherwise be an offence under the Act. But if the Code has indeed been breached then that defence will be unavailable. Have a look at sections 10,11, 12, 13, 14, 28 and 28A, and 29: <http://www.legislation.govt.nz/act/public/1999/0142/latest/DLM50430.html>”

While we understand a breach of the Code is not an offence currently, Ms Coumbe has pointed out that breaches of the Code, when taken together, *will very likely* amount to prima facie evidence of conduct which is also in breach of specific provisions of the AWA 1999. We do not know whether this option, accompanied by the large amount of evidence of Rodeo Code breaches last year, was explored, but would like it to be explored this year.

Failure to uphold the Rodeo Code of Welfare is systemic and entrenched within NZ rodeo and this is most unlikely to change due to a large group of testosterone-fuelled youth eager to prove their manliness, an ageing group that believe things should be done as they’ve always been done, and entrenched beliefs that animals are not harmed in these events despite animal behaviour showing the exact opposite.

We note NAWAC registers harm is done to animals in rodeo in the NAWAC GUIDELINE 02: Dealing with practices which might be inconsistent with the spirit of the Animal Welfare Act, in particular this statement: “For example society as a whole does not want to ban rodeos or zoos so some harm to animals is inevitable.”

The new Code states, under 'Purpose' (p3): "The purpose of this code is to provide information to the owners and persons in charge of rodeo animals *about the standards they must achieve in order to meet their obligations* under the Animal Welfare Act 1999." Unfortunately, once again, the lip service paid by clubs to complying with the Code was not borne out at rodeos, where officials, organisers, judges, announcers, contestants, AW officers and all involved in running and holding the events blatantly disregarded the Code over and over again despite the informal warnings under 'education' from MPI last year.

We understand MPI is very busy, that policing rodeos is taxing on resources for both the taxpayer and MPI and pulls AW staff away from attending to core business, and recognize MPI is in an impossible position at rodeos. One AW officer, or even two, are unable to observe what is going on in 7 - 11 chutes and the arena, and are also out the back talking with rodeo personnel on AW matters.

MPI findings from rodeos will therefore be limited and not give a true picture of the extent of the clubs failure to uphold the Minimum Standards of the Code. There is a great deal to observe due to the large number of animals and trying to do this would mean filming and watching many, many hours of footage. Comprehending the Code, in an applied manner, would take studying this footage very closely. We hope our work will assist with that.

The purpose in writing to you is to acknowledge the position of MPI, to bring several issues to your attention in regard to rodeo itself and at the same time to raise concerns about a couple of the responses from MPI to complaints made. It would seem useful to communicate this to both NAWAC and MPI at the same time, in the hope that this assists. We do understand MPI have not previously focused on rodeo in the way that is occurring now, and are in a learning process about it – as are we – and hope that by sharing our concerns and findings, this process can be accelerated for the benefit of the animals and the NZ taxpayer.

Rodeo Code of Welfare applies to practises/coaching days/buckouts/training/schools etc

We are aware of the NAWAC press release on 1 March 2016 in regard to the Rodeo Code of Welfare and the National Finals rodeo at Outram. <http://www.scoop.co.nz/stories/PO1603/S00008/code-of-welfare-protects-rodeo-animals.htm> (Unfortunately, breaches of the Code were picked up at Outram despite investigators only being present for a small part of the day. Footage will be provided shortly.)

This is the first area of concern we have in relation to MPI. I sent the press release to MPI in regard to training, schools etc being subject to the Code. It appears MPI were not aware of this in the 18 months since the Code came out, despite it being stated on pages 3 and 5 of the Code, and despite raising it with them last year over a "buck out" i.e training session conducted by a contractor at Kihikihi Domain on 3 October. This contractor received a formal warning from MPI in regard to the treatment of a horse at Huntly rodeo and should be a person of interest because of that. This newspaper piece, which was sent to MPI last year, only adds to that concern.

(See article pages 6 and 7 <http://waitomoneews.co.nz/issues/2014.11/2014.11.06.WN.pdf>)

Our group attended the buck out and filmed and photographed and made a complaint that we believe a veterinarian was not in attendance for the day as required by the Code. Discussion at the time was that the Code did not apply to schools, training days etc as that would make it expensive, only on an actual public event rodeo day. This made no sense, as the Code is not

about the attendance of the public, but is designed to protect the animals and they have the same experience whether the public is present or not – in fact, it is likely the animals are treated more poorly when the public is not present.

Rodeo training and schools come under numerous names such as clinics, practices, jackpots, “fun” rodeo, buck outs etc and run all year, *including over the winter months*. We strongly suspect veterinarians have not been present at all or most of these training sessions over the 18 months since the new Code was released. This could easily be checked.

Since MPI were not aware of this requirement, practices, schools, clinics, buck outs, jackpots and coaching days cannot have been monitored at all, and given the gung-ho attitude of a very large number of those involved in rodeo – as demonstrated at public rodeos (television news recently showed one handler kicking a bull in the face) and on social media – and the large number of failures to uphold Minimum Standards at public rodeos when MPI, the SPCA and animal advocacy groups are present – there is every reason to assume the Code is not adhered to at these sessions. This would mean there are a number of contractors, organisers and participants in breach of Code requirements at these practises.

The NZRCA however, were aware of the requirement and published the information for the membership in preparation for the 2015 AGM:

NZRCA Board Remits for the 2015 AGM, published in the Rodeo News, Issue 2 JULY 2015, page 15 states:

“BY-LAWS-AND-REGULATIONS

New Rule – (Article 12)

When affiliated clubs/promoters to NZRCA are using their grounds for Jackpots, Coaching days or general practices they must comply with all NZRCA and NAWAC rules including having an animal welfare officer present and complete all movements of cattle with NAIT. Any expenses incurred to comply with the above are the Club/Promoters responsibility. This applies to all rodeo disciplines covered in the NZRCA rulebook.”

We are aware of some jackpots and practises coming up in the next few weeks, and some recent practise sessions and low-key events that have already occurred. To be a winning rodeo contestant, riders must practise regularly. Veterinarians will not be present at the vast majority of these.

There is a jackpot coming up later this month at Southland on 23 and 24th April 2016 - <http://www.rodeonz.co.nz/latest-news/southland-rodeo-jackpot> where a vet will be required to attend.

McCarthy 32nd Jackpot in Hawea Flat was held on 30 and 31 May 2015 – and will be held at Queen’s Birthday (June) this year. This was a two-day event and is not listed in the NZRCA calendar. The new Rodeo Code applied to last year’s event where a veterinarian should have been present. A veterinarian will be required this year. <http://www.rodeonz.co.nz/i/Files/rodeoNews/RNFeb16.pdf> FEBRUARY 2016

Warkworth rodeo has either recently held a practice day after the 6 February rodeo, or will have one soon. Whether or not a vet was/will be present is unknown.

Easter “Fun” rodeo at Oruru

An Easter “Fun” rodeo at Peria, Oruru, an event that was not included in the NZRCA calendar, was held last month. See facebook page for bull riding photos: <https://www.facebook.com/pages/Oruru-Valley-Rodeo/271515552903227?fref=ts>

A newspaper piece listing all the usual rodeo events at this rodeo, plus bull penning and ‘local’ rides can be seen here:

<https://www.facebook.com/photo.php?fbid=10154590205103765&set=a.1015242625417876.5.1073741825.651628764&type=3&theater>

A vet would be required to have attended for the entire rodeo. Did this occur? Rodeo goers entertained themselves at the Easter Fun rodeo in other ways by using ropes attached to halters of bulls and making the bulls drag them around the arena. Video clips taken by those involved show 3 handlers attached to one rope and a bull struggling and jumping to get free. Some of the handlers are then dragged across the arena. While this was available on facebook, it appears to have been taken down, but we understand NZ Anti Rodeo Coalition have the footage and will make a complaint to MPI.

NZ Youth Development Team and NZ Rodeo High School team are mentioned in a recent Sunday Star-Times article. <http://www.stuff.co.nz/business/farming/77405945/behind-the-scenes-at-the-rodeo--its-about-riding-the-animal-and-conquering-it>

Given the Code breaches throughout the country, it is unlikely practises by these groups involve adherence to Minimum Standards.

Bull Riding Puriri, Inc

This group held an official open day for the new Omaha Valley Sports Arena on 10 October 2015. It held various bull, calf, steer, horse and barrel events. Whether a veterinarian was present or not could be checked by speaking with the vet. Other events may also have been practised.

This group held another practise on 11 and 12 July 2015, offering bull, steer and calf riding, roping practise and something with horses. We have previously seen other entertainment from this group involving handlers being dragged through the arena on their stomach, holding a rope attached to a fleeing horse, the same way bulls were used at the Easter Fun rodeo. Was a veterinarian present as required by the Code? Again, this could be checked.

Brad Scott Bull Riding School 28-29 November 2015

No other information is available. Was a veterinarian in attendance? Presumably there will be another ‘school’ at the end of the year, if not before.

Versatile Ranch Horse

The former Huntly rodeo organisers were subject to a formal warning under the AWA 1999 following footage presented to MPI over the treatment of animals at the 2014 rodeo. Rodeo practise days were held every 3 or 4 weeks before the rodeo closed down (voluntarily) after MPI’s investigation. The arena is being used to rope steers and practise barrel racing as can be seen on this facebook page, Versatile Ranch Horse - <https://www.facebook.com/Versatile->

[Ranch-Horse-173895025982825/?fref=ts](#) Whether any other rodeo events are practised there is unknown. Barrel racing comes under the Rodeo Code so requires the attendance of a veterinarian. This may or may not be happening.

Midnorthern rodeo horse kicked 17X while down in the chute

This is the second issue we are concerned about in relation to MPI. In January or February we made a complaint over the treatment of a horse at Midnorthern rodeo on 9 January 2016. The Code was breached first of all when the animal went berserk in the chute, landing on his haunches, and was not released immediately as required by Minimum Standard No.4 (f)

“Any animal that becomes excessively excited, goes down in a chute, or attempts to jump out of the chute in a manner that may cause it to injure itself must be released”, and Minimum Standard No.4 Example Indicator:

“Animals that become excessively stressed in the chute to the point that they may injure themselves are released *immediately*”. This horse was exhibiting extreme fear.

Following the failure to release immediately, the horse then went down in the chute – another signal that he must be released immediately. Again he was not released. Then, while the distressed animal was on the ground, someone in the arena kicked him approximately 17x in the torso. The horse leapt up, again exhibiting extreme fear, throwing himself wildly, showing the kicking had further distressed him and placed him back in the same distressing position. This was another opportunity to abide by the Code and open the gate and release the horse. Again he was not released. Preparations continued to ride the animal.

Not one member of the organiser group, judges, contractor, AW officer, contestants, or handlers chose to abide by the Code and release this horse. Shortly after, he was ridden, in the final breach of the Code of Welfare. After throwing the rider, the rigging fell off over the horse's head, and the animal went tearing around the arena at speed, in a way that is rarely seen.

MPI showed the clip to 3 veterinarians. Their response, we feel, was insufficient, saying it was no different to what happens when horses are kicked while being ridden.

This situation was very different. Nothing experienced by this horse is on a par with a horse being ordinarily ridden and nudged/kicked during an ordinary ride. There were also aggravating factors at play in the kicking of the horse and the context of this situation was not taken into account at all. This horse was down in the chute in fear, prior to being kicked and should have been under the protection of the Code. The horse had already tried fight or flight to get away. He then resorted to getting on the ground, taking the passive option to make himself smaller. There was nothing more this horse could do to show his distress.

The kicking was given to facilitate yet another breach of the Rodeo Code of Welfare 2014, and was another aggravating factor in this incident. Instead, the gate should have been opened and the horse released immediately. Minimum Standard No.3 (h)

“Animals must not be used if they are likely to injure themselves if placed in a chute”, is also likely to have been breached throughout this episode.

In addition, riders do not kick horses with the toe of a boot, but with the heel, which is quite different – one being pointy, the other being blunt, and kicks with the toe of the boot allow greater leg swinging and therefore greater force behind it. We feel this complaint needs to be reinvestigated and the whole context taken into account. The Code was not written to be disregarded, and *assaults on animals to facilitate breaches of the Code* must surely result in consequences.

Potential and actual bias among MPI and SPCA officers has led to a distorted picture of rodeo

At Gisborne rodeo on 27 December 2015 an SPCA inspector approached me and proceeded to inform me that rodeos are not cruel, that the animals love it and that the SPCA relied on donations from the local community, some who were attending the rodeo. An SPCA manager then approached, dressed in cowboy hat and all the 'rodeo chick' gear. I initially thought she was a rodeo organiser. Upon discovering I was from Anti Rodeo Action NZ, she ended the conversation. The Gisborne rodeo facebook page did not promote the SPCA, Farmwatch and SAFE petition to ban rodeo and deleted a comment from two of our group asking about this. SPCA New Zealand is aware of what happened.

It is often said that there have been no or few complaints about rodeo. This experience is a good example of why that is. In rural communities even some AW officers from the SPCA support rodeo in direct opposition their employer organisation, to science, understandings of animal sentience, Humane Societies, SPCAs and animal advocacy groups worldwide. Rodeo is monitored by many of those that support it, wasting taxpayer money and providing a false impression of rodeo to the general public.

Whether pro-rodeo MPI officers attend rodeos is not known for certain, but is likely, as officers are often drawn from the area and are likely to have friends and family involved. We understand that a manager at the Auckland MPI office has attended a number of rodeos for example. It would seem reasonable that MPI AW officers are asked whether they have attended rodeos for pleasure, or do attend rodeos for pleasure, or have friends and whanau involved in rodeo and are ruled out of investigations if this is the case.

The example at Gisborne confirms some SPCA officials cannot put aside personal bias in favour of rodeo and support employer policy, and there is no reason to presume this would be different with MPI. Potential bias/conflict of interest can only distort and cast a shadow over findings and investigation results. Rodeo has already been protected in this way for years.

On the subject of bias, we understand NZ Rodeo Cowboy Association members were involved in the writing of the Rodeo Code of Welfare. At that time few if any others were able to comment on rodeo in any in-depth way. This has begun to change and we hope NAWAC will soon be able to consult utilizing animal advocacy groups such as ours, drawing from our own extensive investigations into rodeo which can be backed up with footage and photographic evidence. This would produce the other side of the glossy picture presented by rodeo sympathizers and association members. If rodeo was as it has been portrayed, the current situation of exposing Code of Welfare violations and animal cruelty would not be happening.

While rodeo supporters are concerned about bias from animal advocacy groups, the fact is that there has been no end of bias from rodeo clubs, supporters, and AW officers, and clubs

have helped write the Code! It has been a closed shop. As I hope to show in this report, important issues have been missed from that Code.

At Gisborne rodeo two organisers asked me to stop filming, despite the fact that hundreds of other people were also filming. The club was clearly worried about what would be picked up. Given the general public there on the day would not know there were breaches of the Code occurring all day long, but we did, the organisers did not want us collecting evidence for complaints to MPI or the media.

At Gisborne rodeo I spoke with an MPI manager for the Bay of Plenty. I talked through a breach of the Code that occurred while we spoke and he took notes. A horse went berserk in the chute, was not released, and went on to be ridden. Obviously I was not able to film this. The MPI manager went off to speak with organisers. I do not know what happened, but it seemed to make no difference to the Code breaches that continued throughout the day.

Midnorthern rodeo arena surface caused many animals to fall

Minimum Standard No.5 (d) states: “The arena surface *must provide traction* and be free of hazards that may injure animals.”

The introduction to this Minimum Standard also says, “In general, the standard arena should have a suitable, soil based surface, rotary-hoed or softened to a depth of approximately 5-10cm. other surfaces may be used provide that they are *well drained, provide a secure footing* and be at least as safe for the animals as an appropriate soil-based surface.”

The arena surface at Midnorthern was a very heavy soil. More animals fell and almost fell at this rodeo than we usually see. While it had rained, it rains at many rodeos and the ground is not particularly affected. In contrast, arena soils at Warkworth and Waikato for example are more sandy and do not impede or trip up the animals. Footage of these rodeos demonstrates this difference. At Midnorthern even the horses used for calf roping and steer wrestling were slipping and sliding in the heavy ground as they waited to give chase. At other rodeos we have attended this is not an issue. Falling puts animals at risk, particularly as animals are falling while highly distressed and thrashing around. We believe the arena surface at Midnorthern is not safe to hold a rodeo.

Spurs – semi-locked (NZRCA) vs non-locking (NAWAC)

The Rodeo Code, Minimum Standard No.6 (e) states:

“Fully locked rowels, or rowels that are capable of being locked, must not be used”.

And Minimum Standard No.6 (f) states:

“Partially locked rowels, or rowels that are capable of being partially locked, must not be used in the saddle or bareback bronc riding events”.

The NZRCA Board Remits for the 2015 AGM, published in the Rodeo News, Issue 2 JULY 2015, page 15 states:

“BY-LAWS-AND-REGULATIONS

New Rule – (in section 14.27.6) Bull or steer riding spurs – must have minimum rowel width of 5mm and **must be semi-locked**”.

NZRCA regulations that spurs must be semi-locked, is in contradiction to the Code of Welfare requirement.

Spurring of bulls by adults, and spurring of calves and steer by children

The use of spurs is only referred to in the Code, from what we can see, in relation to saddle or bareback events i.e for use on horses: Minimum Standard No.6 (f):

“Partially locked rowels, or rowels that are capable of being partially locked, must not be used in the *saddle or bareback bronc riding* events”.

The Rodeo Code Minimum Standard No. 8 Bull and Steer Riding makes no mention of spurs used for bull, steer or calf riding.

We are unable to find anything in the Rodeo Code Minimum Standard No.12 Calf Riding that refers to spurs used on calves.

The NZRCA By-Law and Regulation above, when referring to spurs, only mentions them in relation to bull and steers, and not calves.

Spurs are used on bulls. Spurs are used on calves and steers by children. We suspect NAWAC may not be aware bulls, steers and calves are spurred at rodeos. Some children are not capable of overtly spurring calves and steers, though wear the spurs, which must make contact with the animals' flanks and therefore affect the animal.

Spurring of horses

Winning contestants lie almost horizontal in the Bareback Bronc event, throwing their legs high in the air and bringing them down with force into the horses shoulders. This drives horses berserk with pain and fear – and the more ‘wild’ the horse appears, the more points are awarded to the contestant, thereby increasing the motivation for the contestant to do this. In equestrian sports spurs are used on the flank of animals and are pressed against the skin. Lying back in a near-horizontal position in order to raise the rider's legs high to bring down more weight and power to ram metal spurs into the horse's shoulders is not done in any equestrian sport and we suspect NAWAC are not aware of this practise and did not have this in mind when approving of the spurring of horses. This could be stopped immediately if NAWAC saw fit.

Goadng of horses by pulling flankstrap tight as they exit the chute

Most horses used for bucking at rodeos are subjected to goading with a flankstrap while in the chute, and as they exit the chute. Handlers do this by pulling the flankstrap for as long as possible so it tightens around the animal's abdomen. Some horses resort to putting their heads down and kicking out while this is being done to them, and while they are still in the chute. If the horse then exits the chute, handlers often wait until the strap is pulled out their hands by the horse, leaning right out over the top of the chute when the horse has already moved into the arena. Some handlers are almost pulled into the chute; such is the length of time they will

hold on to tightly pull the flankstrap around the horse's abdomen. If the animal refuses to exit, the flankstrap continues to be pulled, while the rider also kicks. Some horses are then pulled out of the chute by their halter, forcing them to be ridden.

This is not an animal welfare practise or any part of good stockmanship. It is done purely to aggravate the animal and is one of the techniques used to incite berserk and out-of-control bucking.

Minimum Standard No.4 (a) states: Animals must be handled at all times in such a way as to minimise the risk of pain, injury or distress."

When NAWAC permitted the use of flankstraps, a goad in itself, was this form of goading also approved as appropriate stockmanship? It is not referred to under Minimum Standard No.7.

Minimum Standard No.7(a) states something contrary to the flankstrap being pulled: "The flank strap must not be so tight as to restrict the movement of the horse."

This practise would also seem to be in breach of the fundamentals of Stockmanship required by the Code, particularly in the areas of attitude of stock handlers, empathy and affinity with animals, recognising early signs of distress so that prompt action is taken, recognising abnormal behaviour that indicates distress, evidence of training/competence etc and under Minimum Standard No.4 (a):

"Animals must be handled at all times in such a way as to minimize the risk of pain, injury or distress." This goading is done to induce distress and thrashing around. If not, what would its purpose be? This practise could be stopped immediately if NAWAC saw fit.

Slapping and punching horses in the head when the chute gate is opened

Some handlers and contractors hit, slap and punch horses in the head as the chute gate opens. Horses trapped in a confined space are sensitive to a blow or blows coming towards their head and eyes. One particular contractor specialised in getting horses to rear as the gate opened. This rearing occurred too often to be pure chance. A closer look with a zoom lens revealed hands and fist fast approaching the heads of horses as the chute gate opened and the horse throwing their head high and rearing.

This contractor received a formal warning under the AWA 1999 over treatment of a horse at Huntly rodeo in 2014. Last season footage was supplied to MPI showing this person's hand letting go of the horse's halter, the hand being made into a fist as it moved towards the contractor's body, and that fist flying out at speed towards the horse's head. The blow to the horse was not seen, but the horse threw his head high and attempted to rear.

As with all breaches of the Code and all treatment of animals at rodeo, it occurs in the presence of multiple rodeo personnel and contestants who are all complicit in this treatment. We have mentioned this on facebook recently and the contractor removed his facebook page. We believe this person's conduct needs investigating and footage from last year and this year examined closely.

Rope on the ground dangling in front of horses

This issue was raised with MPI last year. In the Saddle and Bareback Bronc riding a long rope dangles on the ground from the horse's halter after the rider has fallen off. A number of horses stand on this rope and stumble. Some have stood on this rope with a hind hoof. For others it has wrapped around their fetlock/hoof area. Any rider will tell you how dangerous it is for a horse to stand on their own reins or halter rope while cantering or galloping, and all the more so if the horse is throwing themselves around wildly as happens in rodeo – they can break their neck: it is one of the first things a novice rider learns.

In our complaint to MPI last year we included a letter from someone that witnessed a horse breaking his neck as a child at their first and last rodeo. They were extremely traumatised by this sight, and although an anti-rodeo campaigner now, cannot bring herself to attend a rodeo with our group. We have also heard other people say they have witnessed horses standing on the rope and falling and breaking their neck. We believe this is an unacceptable risk for horses, and for the public that witness it - especially children - and immediate and simple changes could be made to eliminate this risk.

Steer wrestling

While an animal is running straight ahead, a rider drops beside the steer, placing an arm over the animal's neck and twisting the head and neck to the left. Because the animal is fleeing, and travelling at speed, its momentum is in a forward direction. The head and neck twist throws the animal and sends it flying, causing the steer to lose contact with the ground as the torso flips around to follow the head. The animal is not brought to a stop first. The direction is not changed before the animal is thrown and sent flying in the process of knocking it down. The direction is changed *by* twisting the animal's neck and head.

Minimum Standard No.11 (a) states: "*The steer must not be knocked down or thrown before it is brought to a stop, or the direction has changed, and the catch is made.*"

The steer is knocked down and thrown before it is brought to a stop. Footage demonstrates this.

While steers receive this initial throw and neck twist, it is then followed by a second throw and neck twist of almost 180 degrees. Sometimes the animal lands in a way the contestant does not want, so the steer is subjected to a third neck twist and throw. Sometimes the contestant shoves the animal's twisted head and neck gratuitously, when technically he has already reached his goal.

Calves go down in the chute with children on their backs and are not released

Video evidence at multiple rodeos shows 2 or 3 handlers get into the chute with each calf and child. The presence of 2 or 3 handlers indicates preparation to breach the Code of Welfare Minimum Standard No.4 (f): "Any animal that becomes excessively excited, goes down in a chute, or attempts to jump out of the chute in a manner that may cause it to injure itself must be released."

Footage shows calves go down in the chute and are lifted back onto their feet by these handlers – thereby fulfilling the purpose of their presence. Footage also shows handlers using

their knees and legs and struggling to prevent calves going down in the chute while the calves are attempting to drop to the ground. Some calves are seen with excessive salivation pouring from their mouths. Calves are not going to stand up with children on their backs, so the only way calf riding can continue is for handlers to breach the Code.

Calves wear flankstraps

Minimum Standard No.6 (g) states: "Flankstraps/ropes must be of the quick release type and covered with a soft material that lies against the hide of the *horse, steer or bull.*"

Conspicuously, calves are not specified in the list of animals that the use of flankstraps applies to, even though there is an event called Calf Riding. Flankstraps, a goad, are worn by all calves ridden by children in the Calf Riding event. Once the child has fallen off, most calves continue bucking, some bucking almost vertically, some calling out in distress while they do it.

Minimum Standard No.12 – Calf Riding – also makes no mention of using flankstraps on calves.

We are not sure whether NAWAC intended for calves to be subjected to flankstraps. If NAWAC saw fit, this practice could be stopped immediately.

Calves used in Rope and Tie on ground in pre chute and chute not released

At one rodeo a calf was filmed on the ground in the pre chute. He was lifted up and sent forward into the release chute and was subsequently chased, sent flying through the air and tied. It is rare to be able to see into the pre chutes, and we suspect, as this happened in front of multiple other handlers, that this is par for the course. Certainly no one intervened to release the calf as required by the Code. Another calf went down in a release chute. He was so small he was invisible until he was made to stand up and take part in calf roping.

Calf Roping/Rope and tie

Clubs are still failing to adhere to Rope and Tie Minimum Standard No.9 (e): "The calf must be tied for the minimum time to meet competition standards and released by experienced handlers immediately after the tie has been signalled."

In this case calves are left lying on the ground, breathing in dirt and sand and twisting themselves into dangerous positions outside the 6 second requirement that they are tied for the competition. One calf at Midnorthern rodeo had his head trapped and twisted beneath his shoulders in what must have risked breaking his neck, or at least stretching and straining ligaments and creating greater risk for him the next time he was roped.

Clubs are also still failing to adhere to Rope and Tie Minimum Standard No.9 (f): "The event must not exceed 30 seconds from the release of the calf in the chute."

The majority of contestants take almost double the 30 seconds allowed, pushing the time out to nearly or more than 1 minute from release to release. Some contestants chase the calf around the arena for 20 or 30 seconds when they know they will not be completing in time. They continue until they have completed the task rather than stop at whatever point 30

seconds has been reached, regardless of where they are up to. It is clearly seen as an opportunity for practise.

At one rodeo the official programme stated there were 30 seconds to rope the calf and *another* 30 seconds to complete the remainder of the event. A copy of this programme was provided to MPI, so they are already aware of this.

Flankstrap does not fall off bull

Minimum Standard No.8 (a) states: "Equipment used for bull and steer riding must be fitted so as to fall off the animal once the rider fall or dismounts, to prevent possible injury to animals."

The flankstrap equipment does not fall off bulls and steers. It is put on in such a way as to remain on the animal until after they have exited the arena. Many continue moving around the arena and continue to buck after the rider has fallen or dismounted. Some bellow at the same time.

Fresh diarrhoea on bulls

Minimum Standard No.2 Example Indicator states: "Dung/manure appearance is normal – i.e no evidence of diarrhoea or constipation."

A considerable number of bulls show signs of fresh, wet diarrhoea over their buttocks. This was raised in our complaints last year, and was not one of the 7 issues the MPI investigation raised with the NZRCA.

Veterinarian attendance at rodeos

Some animals arrive and depart the rodeo during the day, not just at the beginning and end of the day where we understand the vet checks occur. An example of this was at Warkworth rodeo on 6 February this year. We would like to know whether these late arrival and early exit animals also receive a veterinary inspection.

Veterinary checks on animals used multiple times at same rodeo

As it is permitted to use non-contract animals twice at each rodeo, and contract animals three times, we would like to know whether vets check animals for injuries, strains, tenderness, lameness etc in between each use? We have seen some animals exhibiting behaviour that could only be called 'berserk' and then seen them again a short time later exhibiting the same berserk behaviour. For some, this may be due to pain or soreness. For others the distress is psychological.

Animals doing this are the most prized at rodeos, as you are aware, as fear and thrashing around is what is wanted for an exciting ride. If an animal was injured after being used once, and is then used again, and again, the toll on the animal would be all the greater. Because of adrenaline, many injuries, strains etc are masked and would not necessarily show up until the following days – like with humans – but more blatant injuries or tenderness could possibly be detected earlier.

Bull with probable fractured penis used in bull riding

At a recent rodeo a bull was photographed by a rodeo person (possibly the contractor), while being ridden. The bull's back legs were extended in a bucking motion. The bull had an erect penis facing backwards, towards the testicles, instead of forward towards the chest. We consulted with a very experienced large animal veterinarian in the US, former bronc rider, prosecutor and expert witness in animal abuse cases, Dr Peggy W. Larson, sending her the photograph. Dr Larson is also an anti-rodeo campaigner based on her decades of looking into rodeo and her prior involvement as a bronc rider. Dr Larson thought the penis looked fractured and explained why. We sent this photo and information to MPI.

Minimum Standard No. 3(c) – Selecting Animals states: “Animals must not be used in a rodeo if they display injuries, signs of disease, physical abnormalities, abnormal behaviour, signs of fatigue or are physiologically compromised in any other way that could compromise their welfare during the rodeo.”

If it was the case that the bull's penis was fractured – something that only happens with trauma – then the bull should not have been selected for use at a rodeo and the attending veterinarian ought to have picked up this injury. A fractured penis thrashing around vigorously can only have been agony for the bull.

Warkworth rodeo horses appear injured

Footage from Warkworth rodeo on 6 February shows a dapple grey horse that is clearly injured - possibly in both back and front legs - as he exits the chute. It would appear there was a failure to pick up an already injured animal, or perhaps it was his second or third use that day, or the injury occurred as he left the chute. One of our members attended the NZRCA AGM last year, and learned that clubs deliberately conceal animal injuries and deaths from the public and take them out the back and deal with them. We are concerned this horse may have been euthanased because there was so clearly an injury. We made a complaint to MPI in regard to this horse. The Warkworth vet was spoken with and apparently denied any horses were injured or euthanased. This is very difficult to comprehend.

A second horse, a chestnut, also appeared injured on footage. Again, whether this occurred prior to this particular ride (it could have been his second or third use that day) or as he left the chute is not clear. He was not bucking and had his head down, and one of his forelegs was trembling. A pick-up rider saw what was happening and immediately returned to the contestant and removed him before the bell rang for time. This says a great deal. The pick-up rider clearly also saw something was wrong with the horse. The vet at Warkworth denied any horses were injured or euthanased at Warkworth this year.

Last year at Warkworth there was also a horse that appeared to have something wrong with his legs as he left the chute after initially refusing, then being forced to. This footage was provided to MPI last year. At other rodeos similar things have been observed. Frequently, once in the arena, these horses stand trembling, with their heads down, while being kicked, until someone recognizes something is wrong and the rider is swiftly removed. It would seem there is an issue at some rodeos with the selection of animals.

Failure to release immediately animals that have gone down in the chute

Failure to adhere to the Code and immediately release animals that have gone down in the chute is still standard practise at rodeos despite warnings and education from MPI last year.

These animals should not have been selected in the first place as per Minimum Standard No. 3 Selecting Animals Example Indicator:

“Animals that are likely to become distressed in the chute, go down in the chute or are likely to jure themselves by attempting to exit the chute prior to the gate being opened are not used.”

Some animals are not released but shifted next door into another chute. They are still trapped in a chute, albeit a different one, and are no doubt just as stressed and distressed. It would seem this is a way to thwart Code requirements as the animal is not released but remains confined.

The few animals that are released are not released immediately, as required, but when convenient to the club – usually after one or two other rides have been completed. Some wait on the ground in the chute. Some get up and go berserk again while they wait. Many are ridden, no matter how great their distress has been, no matter how many times they have tried to leap out of the chute or have gone down in the chute.

Sunday Star Times article – there is no money in rodeo

We understand NAWAC considers the economic impact of practises that involve animals. The economic impact of those involved in rodeo is explained in this quote from a rodeo member in a recent Sunday Star-Times article:

“There is not much money to be made in New Zealand rodeos. Any cowboy will tell you they do it for the love of the sport. The cost of travelling to the rodeo and accommodation if needed, can be greater than what a rider would make in prize money.”
<http://www.stuff.co.nz/business/farming/77405945/behind-the-scenes-at-the-rodeo--its-about-riding-the-animal-and-conquering-it>

‘Cowboys’ do not make a living out of rodeo in New Zealand. Accommodation in small towns over a one or two day rodeo is often a matter of bunking down with friends and family, so this adds little to local economies. ‘Cowboys’ have regular jobs and some are possibly unemployed. As some follow a circuit around the country over the season, regular employment would be impossible.

Tail twisting

Tail twisting of bulls and steers has occurred again this season. Tail twisting of bulls is severe enough to cause some bulls to immediately try to leap out of chutes, thereby risking injury, and requiring immediate release, which typically does not happen. Sometimes it is the contractor that is doing this.

Bells on bulls

Bells have been heard this season on two or three bulls despite being banned in the 2014 Code.

Announcers encourage breaching of the Rodeo Code of Welfare

Announcers frequently incite handlers to breach the Code of Welfare by making statements about continuing on when the Code is very clear, and the animal must be released immediately.

Severe use of bits

Bits are frequently used severely by riders. Sequences of photographs show horses with their mouths open, ears back and eyes rolling while riders manoeuvre them as though they were motorbikes or some other inanimate object.

Evidence of training

The Code requires there to be evidence of training along animal welfare lines. However, breaches of the Rodeo Code of Welfare 2014 at every rodeo attended in the North and South Islands would seem to indicate welfare training is abysmal and not taken seriously, despite proclamations to the contrary. The evidence speaks louder than words. Code requirements under Stockmanship are not met. There is a lack of empathy for animals from the clubs, a poor attitude and the wanton ignoring of animal behaviour and distress. Those involved claim animals love rodeo, thereby showing themselves incapable of reading basic animal behaviour that most casual observers can pick up. Typical responses to animal distress is to tie them down, or hold them down – sometimes both at the same time - so riders can ride them.

Animal Welfare Officers at rodeos

We question why the rodeo-appointed Animal Welfare personnel are not preventing the large numbers of breaches of the Code that our groups pick up? Rodeo AW personnel are failing in their duty to ensure the Rodeo Code of Welfare Minimum Standards are met.

Organisers responsibility towards animals and adherence to the Code of Welfare.

According to the Code p6 2.1 Responsibilities, the rodeo organiser has “responsibility for meeting minimum standards ... and the competence and supervision of employee performance generally lies with the rodeo organiser. The rodeo organiser also has overall responsibility for the welfare of the animals. Whilst all duties are not necessarily performed directly by the organiser, the organiser needs to ensure that the rodeo staff and stock handlers are adequately performing their responsibilities.”

At each rodeo attended by animal advocates, the multiple breaches of the Code demonstrate organisers are also not meeting their obligations to adhere to minimum standards, nor insisting that others meet the minimum standards. The breaches of the Code are very obvious and not only are organisers failing to ensure these very basic minimums are met, but there is collusion from all involved to fail to meet these minimum standards. Each failure occurs in

the presence of many rodeo club members and officials. If animal advocates can tell when animals should be released, so should club members and officials.

Rodeo animals and meat exports

We spoke with an animal slaughter plant veterinarian in regard to injuries on rodeo animals. The vet spoken with said they did not see injuries on animals from a known rodeo supplier. The company exports meat to overseas markets, including countries such as the UK where rodeo is banned because their society recognizes rodeo is cruel. We consulted rodeo expert Dr Peggy W. Larson from the US over claims injuries were not seen on these animals at slaughter. Dr Larson, a former meat inspector, explained this is because an autopsy is not done on animals for meat export and an autopsy is what is required to see the internal injuries.

Exporting the meat of tortured rodeo animals potentially risks our meat exports. While overseas markets may not currently be aware that they could be buying these animals, once they do become aware it could have a serious economic impact on New Zealand. Ethics is becoming increasingly important in many areas, including in animal welfare. Exposures on the brutality that is happening to New Zealand animals – such as on pig farms, in the dairy industry, the chicken industry and rodeo – are letting the world know our standards are severely compromised and New Zealand is not the land of high animal welfare standards as previously touted. Rodeo is not a necessity in this country, but a hobby for essentially, a small number of people. We believe NAWAC could act quickly and insist rodeo animals do not enter the human or pet food chains, thereby putting a safety wall around our meat exports.

Anti Rodeo Action NZ is available to meet with NAWAC and MPI if required to discuss our findings and show footage. A large amount of footage from the 2015/16 rodeo season will be sent to MPI in the next few weeks. As I'm sure you can appreciate, we are members of the public with jobs to hold down, and it takes a great deal of time to work through footage and provide notes, and is done in our spare time.

We consult regularly with expert on rodeo, Dr Peggy W. Larson from the US. Dr Larson was a large animal veterinarian, prosecutor, former meat inspector, bronc rider, expert witness in animal abuse trials, and recipient of Humane Society awards and is very experienced in the issues of rodeo. Dr Larson was raised in a rodeo family. She is now an anti-rodeo campaigner and is able to provide a wealth of information and much needed expertise to get behind the myths and mistruths associated with rodeo. While we understand NAWAC has consulted with veterinarians on rodeo, including some from the US, we know Dr Larson is able to offer a vastly different perspective to what these others have given to NAWAC.

NAWAC and MPI should also know that a highly-educated, middle-aged, female animal advocate attending her first rodeo with our group this season was assaulted and falsely detained for around an hour by a rodeo "security guard". This occurred in front of many rodeo supporters and their children. The NZ Police are taking the matter seriously, particularly as the assailant is a non-sworn police officer.

We are hoping the NZ Government will take the 63,000 signatures collected in the recent SPCA, SAFE and Farmwatch petition to ban rodeo, seriously. The vast majority of New Zealanders have no idea what goes on at rodeos – as we ourselves didn't – so public awareness is only beginning. We hope middle-aged women will not risk assault for trying to stop what is pure animal abuse.

We hope NAWAC will take the information in this report seriously. The animals tell the story of rodeo and they are showing they are tormented, terrified and hurt. The government and the people of New Zealand must listen to them. Rodeo must be banned – the sooner the better.

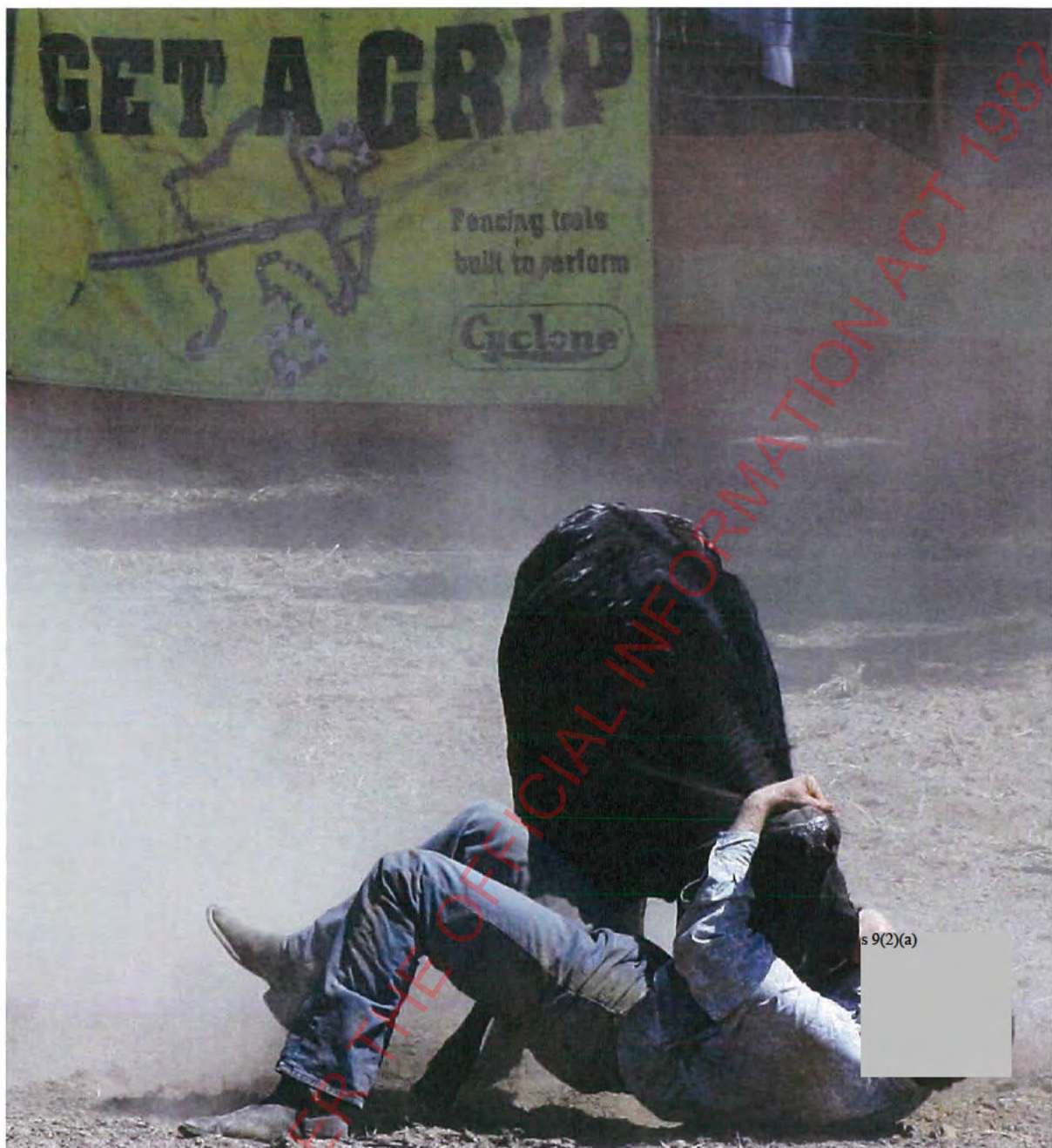
Our facebook page shows some of the clips and photographs from the 2015/16 New Zealand rodeo season and can be seen here: <https://www.facebook.com/Anti-Rodeo-Action-NZ-717764535000442/>

Yours sincerely
Lynn Charlton
Anti Rodeo Action NZ

s 9(2)(a)



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RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: Sam Stocker <s9(2)(a)>
Sent: Thursday, 19 May 2016 4:55 p.m.
To: Animal Welfare Submissions
Subject: Factory farming

*o the Ministry of Primary Industries,
This is my submission on the regulations released for consultation in April 2016.*

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

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

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

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

Finally, I would like 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.

S.Stocker



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From: MARK SHAKESHAFT s 9(2)(a) >
Sent: Thursday, 19 May 2016 4:48 p.m.
To: Animal Welfare Submissions
Subject: prong collars

Hi my name is Mark Shakeshaft & I grew up around working farm dogs since birth on sheep stations around the North Island NZ.

I have also been around large breed dogs like the Dobermann, Rottweiler, Bullmastiff spanning a 3 decade period, successfully retraining a few mature dogs bound for death row due to poor upbringing & extreme lack of training, making them fit to take anywhere in public, I have used both choker chains & prong collars to achieve that goal.

Over the years I have been involved with various Kennel Club Obedience clubs in the Whitsundays, Sydney & Melbourne Australia which some only using the Positive Only training methods which doesn't work on all dogs, I re-homed a European working line Dobermann Bitch in February 2014 which was classed as extreme & unfit to take anywhere in public.

I called the local obedience dog training club & they told me to call a dog psychologist to find out her issues, I didn't need to find out her issues, she was not socialised properly & had fear aggression, I fixed her issues myself exposing her to all the situations she didn't like correcting her with a check chain, I had 2 prong collars given to me with the dog, I too couldn't get past how beastly they looked, getting into debates about their use, after putting one around my own neck & applying pressure found it didn't hurt & overall is far more humane than the choker chain, the prong collar is banned in some states of Australia limiting their use, choker chains can cause permanent damage to the trachea & far more invasive than the prong collar, the Positive only training method encourages dog handlers to ignore bad behaviour & using food treats to train their dogs with no consequences for bad behaviour which I found to be very bazzare! I trained my dog my way outside of Obedience putting her in the top class in under 3 months after lots of hard work & help from a trainer that worked with training Prison dogs.

I did some volunteer work at the RSPCA in Melbourne VIC which opened my eyes because the kill rate there was very high, if a dog couldn't be re-trained using the Positive Only method would be destroyed which I found very disturbing as some dogs need different training methods for success, My working line dobermann bitch would have been destroyed had she been surrendered to the RSPCA or a dog shelter as she is a high drive dog bred by a security company in Melbourne.

I moved back to NZ October last year importing this dog which is a great ambassador to the Dobermann breed, she has a very stable temperament, knows the rules & boundaries, living a very happy life with lots of freedom, her corrections initially were very brief, people don't like correcting dogs because they think its cruel so will live with bad behaviour for the rest of the dogs life creating limitations to where they take the dog, being a slave to them.

s 9(2)(a)

I have seen lots of small sized or injured dog handlers with big dogs struggling to keep control of them, but with the prong collar control comes alot easier so think the collar creates a humane win, win situation.

I have seen lots of debates on the use of the prong collars being cruel & barbaric but these animal activists have never used them & can only come up with the argument that the collars look barbaric & will never use them on their dogs,

Some dogs need a prong collar used on them, others don't but its great to have the option if needed, in some cases will save a dogs life giving it another chance, Please look at the bigger picture & not banning a good correction tool on appearance. Thank you for taking the time to read my submission.

Kind Regards,
Mark Shakeshaft.

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Out of Scope

From: Helen McCabe <§ 9(2)(a)>
Sent: Thursday, 19 May 2016 4:47 p.m.
To: Animal Welfare Submissions
Subject: Submission on Animal Welfare Regulations
Attachments: CDANZ-Submission-Animal-Welfare-Regulations-2016.pdf

I, Helen McCabe (Ph: § 9(2)(a)) § 9(2)(a) would like to make a submission in regards to the proposed animal welfare regulations.

As the consultation process is drawing to a close and I have been unable to draft a full response, please refer to the attached document drafted by Chained Dog Awareness NZ Trust. Please be advised that I fully support their submission and would like to reiterate the points they have touched on.

Unfortunately I am out of time to go through each point separately, however I would like to propose that all instances mentioned where an offender is causing unnecessary pain or discomfort to an animal have the potential of the offender being infringed and/or prosecuted. Of course, the extent to which they are penalised would be on a case-by-case basis, however more needs to be done to protect our animals and more needs to be done to penalise people who knowingly or unknowingly break the law in regards to this.

I would also like to propose that the regulations that are put in place allow enforcement to effectively take place instead of holding empty threats that cannot be actioned, leaving animal welfare agencies with no leg to stand on, and allowing offenders to continue offending.

Thank you for your time and for helping to protect our animals.

Kind Regards,
Helen

Submission from Chained Dog Awareness NZ Trust on the Proposed Animal Welfare Regulations



Chained Dog Awareness Trust
Po Box 131 068
Onehunga
Auckland

info@cdanz.org
www.cdanz.org

Submission by Chained Dog Awareness NZ Charitable Trust on the Proposed Animal Welfare Regulations

Background

Chained Dog Awareness in NZ (CDANZ) is a registered charity that is fighting to end the life-chaining of dogs in New Zealand. We are currently the only charity that specializes in working with Chained Dogs predominantly, and have gained many years of experience and expertise in this area. All of the people working with CDANZ are volunteers who give their time freely to help those who can't speak for themselves. It is staffed by a core team of 7 volunteers, and over 12,000 supporters.

CDANZ was started in 2001, and in 2007 was incorporated into a charitable trust. Over this time we have rescued or rehoused over 600 life chained dogs, including many of their offspring. CDANZ and its volunteers work within the existing confines of the law and liaise with the SPCA, the Police and local authorities in the course of carrying out its valuable work. We are currently working with around 80 dogs in Auckland alone.

We provide education & support to those owners willing to accept help, so that their dogs can continue to live with them & have happier lives. We hope that by showing people that, with proper care and attention, dogs can be wonderful family members who can bring so much pleasure to their lives. We also rescue dogs when they cannot stay with their owners, either because the neglect is too much, or because the owner acknowledges that they are unable to properly care for their dog. When dogs are relinquished to us, we rehabilitate & rehome them to homes where they will be loved & treated like a member of the family.

CDANZ is not funded in any way through government, regional or other charitable organizations, and relies solely on donations and the voluntary contributions from its core team and "friends".

Summary of Position

CDANZ's core team has read through the Review Paper issued by the Ministry of Primary Industries.

In general terms, CDANZ welcomes the Review Paper and believes there are specific areas relevant to it that should be the subject of amendments both to the primary Act, but also to the Code of Conduct (the Deemed Regulations) relating to dogs. CDANZ believes that Option 2 (Developing Regulations) is appropriate to address the issues that it currently deals with.

We believe that the enforcement toolbox is not strong enough to deal with the issues that CDANZ deals with and we support the proposed regime of instant fines and compliance notices. But CDANZ does not believe the Review Paper goes far enough to consider some important areas and we have identified specific aspects where the Review should consider. CDANZ has identified and is submitting an important additional technical amendment to the Act.

We have noted the comment in the Review Paper that the focus of the review is on improving the way in which the Act operates by providing greater clarity and enforceability – in our submissions, we have sought to demonstrate this, while focusing on our primary objectives which relate to chained dogs as we believe that our submissions have a wider application to other species and the overall ambit of the operation of the Act.

Answers to questions/proposals in the Review Paper

Because not all the questions and proposals are relevant to CDANZ's activities and stakeholders, we are submitting only on the questions/proposals directly relevant to us.

From CDANZ's point of view, we believe that domestic pets form part of the family unit and should be treated with a similar level of care and respect that you would treat your own family members.

We welcome the Government's intent that it sees itself providing a leadership role in setting and maintaining mandatory animal welfare standards and acting rapidly and appropriately when standards are breached. To date, these are issues which CDANZ believes have not been addressed and in our submissions below, we will explain why we take this view.

In short, CDANZ's view is that the current Code of Conduct and Recommended Best Practice are an extremely light handed way to deal with a real issue, namely the tethering of dogs. It is not sufficient, in CDANZ's view to have a recommended best practice to allow one hour's worth of exercise a day for dogs. There needs to be minimum **enforceable** standards/regulations - from our own investigations, the most common excuse is to say that offending owners walk the dog at night when enforcement officers are either not on duty or unable to conduct proper monitoring.

We also welcome the intent that the Government wants better evidence and measurement of animal welfare performance. CDANZ submits that the current regime does not allow proper assessment and analysis of breaches of the Codes of Conduct or the Recommended Best Practice. For CDANZ, we believe that animal welfare performance for dogs needs to go a lot further than the current standards prescribed in the Code of Conduct. Many of these reasons are further detailed below.

In terms of whether the Government's stated values reflect those of the community at large, CDANZ believes that the values that we have a duty to preserve and maintain the welfare of the dogs and other animals is shared by good dog owners, but not by the irresponsible owners that we see every day.

Most dogs we see are relinquished by their owners as sections aren't fenced or the owners don't have the money to spend on the dog, or show little interest in obtaining information that would improve the care of their dogs.

Even in the case of dog owners who think they have a good idea of a dog's physical needs, they often do not consider the behavioural aspect that comes from the fact that dogs are naturally pack animals and need to run as part of their daily routine. For those reasons, CDANZ is working to eliminate life chaining/tethering of dogs as this is a very important step in increasing dog welfare, but also social welfare in that better dog care will lead to better family care.

From CDANZ's point of view the Code of Welfare for Dogs is not effective in dealing with the issues closest to its interests – namely the tethering of dogs and prevention of inhumane treatment. CDANZ's core team is familiar with the current Code of Welfare and we feel that that current regime does nothing to improve the welfare of dogs which are tethered for most of the day as the Codes of Welfare/Recommended Best Practice do not have the full force of the law.

CDANZ supports Option 2 – Developing Regulations. We understand the concerns expressed in the Review Paper that some of the existing minimum standards might not be able to be made into

mandatory regulations, but in terms of banning inhumane treatment of animals, not only dogs, it is too important to get wrong.

CDANZ also believes that if the minimum standards were made enforceable, there would be an increase in the quality of care afforded to dogs by their owners. In other words, the onus would be on the owners to improve the living standards of dogs and not leave them neglected or under-cared.

CDANZ does not fully support Option 3. The key reason is that it is only a slight improvement on the status quo.

However, as to guidelines, while CDANZ accepts that from time to time certain animal sectors or breeds or types will need specific guidelines, CDANZ believes that the issue with the current "best practice guidelines" are that they are not taken seriously and do not have the force of law. This is certainly the view taken by errant owners encountered by CDANZ who are either unaware of the guidelines or dismiss them altogether as being nothing significant. From CDANZ's point of view, it is essential to have mandatory regulations which have the force of law and that will only come through the formalization either in the main Act or in Regulations.

From CDANZ's point of view, we believe that the Government should also consider the addition of the safety (from an owner and a public point of view) and a social factor when looking at animal welfare standards. We believe that these are logical additions when taking into account the impact of domestic animals of all types and their interaction with the Community at large.

Statistically speaking, CDANZ believes that dogs which are kept in safe and humane environments are better animals not only for themselves, but for their owners, and are much less of a risk to the general public as they would be better socialized. Research from the USA (The Humane Society of the United States, The American Veterinary Medical Association, and the Centre for Disease Control) has shown, in summary, that:

- Chaining dogs is both inhumane and a threat to the safety of the confined dog, other animals and humans
- Dogs that are kept alone on one spot for hours, days, months or years, suffer immense psychological damage – they become neurotic, anxious and can become aggressive.
- Dogs rapidly develop sores and raw necks due to improper neck apparatus and straining to escape confinement.
- Chain entanglement is common and the dogs are then unable to access food, water and shelter
- Chaining creates aggressiveness not protectiveness.
- Chaining violates the dog's nature as social pack animals.

Numerous attacks on people by tethered dogs have been documented. The Journal of the American Veterinary Medical Association reported that 17% of dogs involved in fatal attacks on humans between 1979 and 1998 were restrained on their owners' property at the time of the attack.

New Zealand statistics are not pretty either. According to the NZ Medical Journal Volume 120 #1259:

- There were 11,708 dog attacks in NZ in 2011
- These attacks cost \$2.4 million in ACC claims
- Chained dogs are 2.8 times more likely to bite than unchained dogs
- Most attacks by chained dogs are on children, as children do not understand and are not capable of diagnosing aggressive behaviour in a chained dog

CDANZ acknowledges that the Act as a whole is designed to be as wide ranging as possible and not limited to any particular species. We believe that what we are highlighting has a not dissimilar impact for any other animal species kept in substandard/unsafe/inhumane conditions.

In the last few years, CDANZ has observed, inter alia;

- Over 80 homes, whereby the chained dogs on these properties have been uplifted and killed for non-registration, 3-5 months later the majority of these same homes have a new pup chained.
- Numerous instances of small stones and other items being thrown by children over/through the fence at the neighbours chained dog.
- One particular instance, whereby a 5 year old boy was found beating a placid chained dog who has been here for 8 years since puppyhood. The child was told never to come back on the section. The next day he came back and beat the dog. The dog, unsurprisingly, bit the child.

This is merely the tip of the iceberg.

If, as we propose further on in our submission, CDANZ's proposal to amend the act in relation to tether is adopted, there may be a need to be a transitional provision if the dog owners are required to put in place a dog run or complete fencing, or take other steps. However, in relation to the issues within CDANZ's control, and its remit, we see no reasons for exemptions in relation to dogs, however we would acknowledge that there may be some instances where this may be required for other animals.

Given CDANZ's remit, we do not make any submissions as to whether "economic impact" is a useful or appropriate addition to the proposed criteria.

Enforcement Provisions

CDANZ urges Government to greatly improve the current enforcement provisions.

From CDANZ's point of view, the current enforcement provisions are sadly lacking or simply do not work. The issues of care and welfare that are being addressed daily by CDANZ are basically ignored to the detriment of both domestic dogs who are kept tethered for no good reason and to the detriment of their owners who do not understand that such behaviour is detrimental for their dogs. In our submission, this is an area where the Ministry and Government need to take urgent and significant action. CDANZ routinely deals with on average 4 or more chained dogs a week, and would see at least 15 new dogs chained up. We currently have over 80 dogs we are looking after in Auckland alone.

CDANZ believes that the impact of allowing instant fines and issuing of compliance orders would not only greatly benefit the work of CDANZ but would go a very long way to improving the safety of dog ownership, improve the care and physical and mental state of domestic dogs as a whole. We therefore believe that the benefits would outweigh the risks of implementing instant fine and compliance notices.

CDANZ believes that tethering or otherwise restraining an animal by any means should be classified as an offence and that it should be the subject of an instant fine.

Specific Proposals within the Review Paper

Proposal 4 – Dogs – Pinch and Prong Collars

From CDANZ's point of view we would strongly support Pinch and Prong Collars being banned from NZ, in conjunction with instant fines and compliance, and believe this should be adopted as soon as possible.

Proposal 5 – Dogs – Injuries from Tethers or Collars

From CDANZ's point of view we would strongly support stronger regulations in regards to injuries from tethers and collars, in conjunction with instant fines and compliance, and believe this should be adopted as soon as possible.

Proposal 7 – Dogs – Dry and Shaded Shelter

From CDANZ's point of view we would strongly support stronger regulations in regards to shelter being provided for a dog, in conjunction with instant fines and compliance, and believe this should be adopted as soon as possible.

Proposal 8 – Dogs – Dogs left in vehicles

From CDANZ's point of view we would strongly support stronger regulations in regards to dogs being left in vehicles, in conjunction with prosecution, and believe this should be adopted as soon as possible. We would also like to see a provision where an appropriate enforcement officer was able to force entry to the vehicle immediately, at the cost of the dog owner.

Proposal 9 – Dogs – Secured on moving vehicles

From CDANZ's point of view we would strongly support stronger regulations in regards to dogs being secured on moving vehicles, in conjunction with instant fines and compliance, and believe this should be adopted as soon as possible.

Proposal 10 – Dogs & Cats - Drowning Dogs & Cats

From CDANZ's point of view we think that making drowning any animal deliberately a criminal offence is something we strongly support and believe this should be adopted as soon as possible. We would have thought that the reasons for doing so were obvious to all.

CDANZ also submits that a technical amendment to Section 14 should also be included as follows:

- Adding a new Section 14(1)(c) which would read as follows;

A person commits an offence who, being the owner of, or a person in charge of, an animal, without reasonable excuse...

- c) ***chains, tether or otherwise restrains any animal by means unless such restraint was absolutely necessary to complete a specific task, except where an animal was in immediate danger to the health, safety or welfare or to the public at large***

We would also welcome the opportunity to engage in discussions with the Minister of Ministry Officials as part of the wider consultation process either prior to amendments of the primary Act of the Deemed Regulations.

Dated this 19th of May 2016

Christine Breen
Amanda Fraser-Jones
Trustees

Chained Dog Awareness NZ
PO Box 131 068
Onehunga
Auckland

info@cdanz.org
www.cdanz.org

Phone s 9(2)(a) (Amanda)


Further Information

NZ Dog Bite Statistics

As you can see from the table below, reported dog bites are on the rise in NZ.

Extract from ACC report dated 30th Jan 2016

Table 1. Number of new dog bite claims by age: 2005 - 2015



Age	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
0-4	729	695	732	711	715	802	773	792	732	803	815
5-9	695	727	783	717	781	764	799	765	860	830	871
10-14	552	589	650	608	625	683	644	630	625	598	650
15-19	500	621	559	595	634	699	598	681	667	668	647
20-24	578	624	630	625	713	720	730	761	807	884	868
25-29	493	546	588	599	566	617	628	673	740	728	832
30-34	566	566	564	505	544	580	536	593	647	634	684
35-39	570	596	650	602	626	656	617	618	658	658	647
40-44	584	658	659	704	731	754	704	776	828	791	795
45-49	562	603	659	680	761	769	736	892	935	912	951
50-54	513	591	640	630	697	687	755	834	910	881	1,004
55-59	536	519	574	568	553	659	675	757	813	770	880
60-64	397	432	442	511	549	594	578	638	686	700	765
65-69	325	332	381	389	449	436	489	559	646	700	691
70-74	253	298	324	360	330	401	415	510	522	519	547
75-79	256	279	309	338	311	366	312	309	441	456	520
80-84	172	204	212	251	258	184	334	290	352	346	399
85+	128	171	186	196	203	222	246	254	327	348	370
	8411	9051	9542	9584	10046	10577	10569	11392	12196	12221	12937

Cost of active dog bite claims by age: 2005 - 2014

Age	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
0-4	\$76,400	\$88,190	\$85,153	\$113,276	\$107,984	\$103,623	\$158,435	\$141,210	\$132,158	\$130,750
5-9	\$108,344	\$99,284	\$97,615	\$136,142	\$137,106	\$145,737	\$105,989	\$116,365	\$187,847	\$283,353
10-14	\$62,268	\$70,333	\$75,246	\$114,895	\$95,595	\$89,316	\$102,232	\$110,173	\$89,450	\$107,368
15-19	\$72,099	\$86,024	\$121,392	\$118,390	\$96,116	\$92,914	\$127,053	\$129,511	\$104,520	\$87,347
20-24	\$79,442	\$91,008	\$108,222	\$145,272	\$164,814	\$152,812	\$154,979	\$137,419	\$167,579	\$239,506
25-29	\$89,151	\$177,426	\$185,246	\$175,192	\$140,158	\$92,196	\$165,121	\$181,520	\$157,980	\$217,931
30-34	\$217,018	\$228,665	\$178,212	\$191,303	\$107,680	\$160,395	\$127,242	\$173,143	\$152,447	\$217,540
35-39	\$198,612	\$210,191	\$195,495	\$338,769	\$175,531	\$190,579	\$180,482	\$238,689	\$211,620	\$343,853
40-44	\$223,608	\$312,744	\$335,875	\$318,288	\$289,215	\$243,479	\$278,387	\$252,638	\$325,871	\$330,917
45-49	\$159,132	\$293,419	\$269,731	\$259,291	\$222,023	\$283,707	\$293,340	\$376,025	\$445,677	\$409,062
50-54	\$150,351	\$252,230	\$256,019	\$288,950	\$215,188	\$223,432	\$319,538	\$451,611	\$643,367	\$580,110
55-59	\$201,737	\$240,667	\$277,498	\$257,458	\$206,961	\$465,119	\$212,755	\$292,898	\$351,749	\$711,549
60-64	\$97,493	\$129,729	\$215,155	\$240,505	\$230,791	\$180,676	\$199,072	\$211,628	\$300,205	\$447,917
65-69	\$92,232	\$83,007	\$93,183	\$104,749	\$99,625	\$127,001	\$161,320	\$166,489	\$285,739	\$206,470
70-74	\$72,623	\$68,616	\$98,233	\$111,240	\$105,476	\$104,693	\$136,050	\$146,504	\$148,248	\$140,112
75-79	\$74,027	\$82,655	\$97,371	\$90,426	\$85,718	\$87,152	\$62,724	\$101,062	\$128,996	\$171,450
80-84	\$50,091	\$46,923	\$81,418	\$69,993	\$89,352	\$99,599	\$79,865	\$98,296	\$110,267	\$104,506
85+	\$66,078	\$61,695	\$112,283	\$99,308	\$64,154	\$77,170	\$80,591	\$108,738	\$121,076	\$133,515

\$4,863,256

As previously mentioned, the NZ Medical Journal Volume 12 states "Chained Dogs are 2.8 times more likely to bit than unchained dogs".

There was also an article in the NZ Listener in May 2016, where renowned dog trainer Geoff Bowers advises the following;

Never leave a dog chained up. It's not just cruel, but also practically a guaranteed way of training an attack dog. People with insecure properties who need/want to leave the dog outside for any length of time should invest in a crate or a secure run. Bowers says even tethering a dog outside a shop for a short time is risky.

"Again its flight, fight or freeze, and a chained dog has not a lot of options. It can't get away, so it will feel threatened." Habitually chained dogs become hyper-anxious because they know the only way they can deal with threat is attack.

Most dog attacks by chained dogs are on children, as children do not understand and are not capable of diagnosing aggressive behaviour in a chained dog and will therefore encroach on the territory of the dog on the chain.

Petition

Please find below a link to a petition that has over 10,000 signatures. CDANZ also have many signatures in physical copy that are able to be provided;

[https://secure.avaaz.org/en/petition/The Minister of Primary Industries Nathan Guy Stop the chaining of dogs in New Zealand/](https://secure.avaaz.org/en/petition/The_Minister_of_Primary_Industries_Nathan_Guy_Stop_the_chaining_of_dogs_in_New_Zealand/)

Overseas Research and Information

Overseas studies have repeatedly shown that there is no statistical significance in using breed as a determinant of dog attacks (beyond their underlying proportions in the dog population). However they have consistently shown that between 80-87% of the total number of attacks occur from non-neutered males, and over 50% from chained dogs (while still chained).

This research has concluded that chained dogs are;

- 3 times more likely to attack
- Chaining causes attacks
- Children are the most common victims

The majority of dog attacks occur within the confines of owners' properties, often within the confines of the chain the dog is shackled to. The rest are wandering dogs.

Chaining violates the dogs' nature as social pack animals. Studies have shown chaining to have the following impact on the dog;

- Solitary confinement
- Socially compromised
- Stress induced environment
- A chained dog is an unsupervised dog whose aggression increases as it daily rehearses aggressive behavioural sequences over and over again
- A chained dog is over excited with people which can result in biting
- Pent up energy that has nowhere to release
- Cruelty and abuse

Chaining makes dogs more territorial resulting in defensive behaviour which is abnormally intense. Chaining increases the likelihood of a dangerous defensive response such as barking and lunging.

As a chained dog does not have the option of a 'flight' response it will more often than not choose to stand its ground and therefore produce a 'fight' response which can result in an attack.

Legislature

The impact of anti-tethering laws/ordinances passed in many overseas countries, and particularly referring to the USA have been passed for 2 significant reasons;

- Safety of the public
- The humane treatment of animals

These laws have made it possible to educate pet owners about the importance of interacting with their pets, providing proper activity, exercise, and have given local authorities the ability and the 'teeth' to prosecute the individuals who refuse to comply.

Laws have been passed as tethering has resulted in;

- Dogs breaking off the chain and therefore escaping and biting/attacking
- The tethering being a hazard for the dog which can result in choking/hanging
- Inhumane treatment of the animal

Tethering/Chaining is banned altogether in many states and countries. Others specify that the dog must be off the chain for a specific period of time – the negative impact of time restriction being that it is extremely difficult to enforce.