

Ministry for Primary Industries - Proposed Animal Welfare Regulations Industry Stakeholder Workshop - 14 March 2017

The purpose of the workshop was to discuss the regulatory proposals and how we can build on the work to date to ensure the proposals are practicable and effective.

Stock transport, Horns and Antlers and Farm Husbandry proposals were discussed at three different tables. Three sessions were held and workshop participants moved between tables.

Stock transport

What transport are we covering?		
Session One	Session Two	Session Three
<ul style="list-style-type: none">• Generally it was agreed that transport is transport no matter how short or long the distance travelled is, or whether it is between farms, or run off blocks and the home farm, it should be covered, otherwise this leaves a loophole from the get-go.• Transport should be allowed for treatment between farms but with a vet certificate. Where it is within the animal's best interest it should be able to be transported.• Trying to regulate based on transport that requires an Animal Status Declaration Form (ASD) is impractical, ASD's are not required farm to farm regardless of distance.• Don't bother regulating based on truck type or height, if an animal isn't fit for transport then the height of the truck doesn't matter, it shouldn't be transported.	<ul style="list-style-type: none">• No discussion.	<ul style="list-style-type: none">• The home farm has the best facilities to deal with treating an animal for injury/disease. It would be counterproductive to forbid transport between run-off and home farm. Short transport under these circumstances should be allowed.• Suggested regulating to allow transport between run-off's and home farm with the same National Animal Identification and Tracing Scheme Number (NAIT) number, as one NAIT number can cover non-contiguous land parcels within 20km. This would put a limit on extended transport for corporate farms with run offs a long distance away.

Emergency provisions		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> • Be careful about writing a black and white regulation, and relying on the courts to interpret them differently for emergencies. • If emergency provisions were written into bobby calf regulations then why is it not appropriate to write them into these new batch of regulations? • If there are civil defence emergencies or natural disasters such as flooding or earthquake relief then there should continue to be an allowance for transporting stock out of an emergency situation. Droughts should be an exception to this, as they develop over time and should be able to be planned for. • Some people are nervous about not including an exception as every compliance officer is different and may judge situations differently. Exceptions might not be applied evenly across the board. • There may need to be further information and education for farmers and transport operators about when a situation should be classified as an emergency. • It would be better if MPI people were trained to recognise emergencies and act with discretion. Handing out infringements haphazardly and then requiring a farmer to contest this if they were in a state of emergency is very stressful for the farmer. 	<ul style="list-style-type: none"> • Relying on regulations to specify appropriate emergencies is worrying. There is already enough stress on a farmer in an adverse event they shouldn't have to worry about whether they meet a black and white regulation. Discretion would be preferred for this. • If we are not infringing for transporting an animal that is unfit during an emergency, say a bad case of cancer eye, following the emergency would the farmer then be investigated for not initially treating the animal? 	<ul style="list-style-type: none"> • Is this covered by the Act in a similar way to the emergency provisions on human life are the Act? • A Ministerial declaration of an adverse/emergency event is not always timely enough, if going down the route of specifying when something is considered an emergency then it is probably more appropriate to look at when civil defence declares it. • Droughts should not be considered an adverse event/emergency as you have time to plan for this.

Enforcement - Discretion		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> • Concern that there may not be a consistent approach with AWI's in using their discretion. 	<ul style="list-style-type: none"> • No discussion. 	<ul style="list-style-type: none"> • No discussion.

Injured or diseased udders		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> • Current infection should not be included because it would capture low grade subclinical mastitis that should be able to be transported. The listed symptoms should be enough to cover off bad udder cases. • Could the word lesion be used instead of injury? Injury implies some kind of external force has caused it, we want to capture burst udders which are very common and not caused from external forces. • Transporters believed it was impractical to require them to walk around a herd of cattle or sheep and individually inspect each udder. • Sheep are commonly culled because of the state of their udders so farmers should know what condition the udders are in prior to transport. 	<ul style="list-style-type: none"> • Severity of bleeding needs to be classified so a small scratch that happened in the race or during loading is not included. Some transporters may refuse to take animals unless it is made clear in the regulation that rules are about major bleeding. • In some cases it is better to transport the animal with an injury (such as an injury to the tip of a teat) before the injury can get infected. • Regulating just for transport is not dealing with the real problem of these injuries/cases being allowed to happen on farm. Extend the regulations to cover on farm incidents like the ingrown horns proposal. • It was generally felt that in the first instance the farmer should be receiving the harshest punishment as they let a problem occur. The transporter should either not be infringed or should not be looked at in the first instance. If signs are really obvious then maybe hold the transporter accountable, but don't hold them accountable for very minor/undetectable case. 	<ul style="list-style-type: none"> • Issues with udders in sheep are much harder to recognise and identify. It is very obvious in a dairy cow. • Sheep should be regulated separately on the grounds of practicality. It is hard to pick up and quite uncommon in sheep. Sheep are also less physiologically capable of showing pain so it is harder to tell if they have infected/injured udders. • It may be impractical to require a vet certificate for an udder that is not chronic or painful but shows the other symptoms such as inflammation. If a dairy cow has a swollen quarter but it isn't mastitis then this would be captured. Alternatively if an animal has chronic mastitis it may not show the symptoms of this in the way the regulation currently describes.

Cancer eye

Session One	Session Two	Session Three
<ul style="list-style-type: none"> • There should be a lower limit written into the regulation. It is quite common for farmers to miss cancer eyes that are small and not causing a problem – these should be allowed to be transported. Could this be a percentage of the eye? The appropriate level for this depends on the case, if it is rubbing on the cornea or is discharging then it is not appropriate for transport. • There should be a varying scale for the size of the cancer eye for sheep and smaller animals. • Cancer eyes may not be noticed in beef animals on the back blocks. They can grow back quickly if they have historic cancer eyes. The farmer should be aware of this and be managing the animal appropriately if it has previously had one. • Processers try to blame the transport operators but it is the farmer that has watched this thing grow and has had time to deal with it. In most cases the transporter won't have noticed it. The farmer should be infringed in the first instance. • Different opinions were expressed on whether the size of a cancer eye should be identified in the regulation. Some participants felt that no size should be in regulation, only other symptoms (discharge, irritation, etc.). Others felt that a size was important as none of the above symptoms may be present but the cancer could be large and therefore get knocked in transport and cause pain. • If cases are marginal they are often sent to pet-food processors. If a bad case arrives at the works and the animal was certified as fit for transport by a vet, and then injuries occurred in transit because the growth is too large then the vet would be seriously looked at. • Need to make it clear that this is covering cancer eye and not pink eye or grass seed etc. This should also be extended to include other animals (although this would then capture dogs going to the vet etc.) 	<ul style="list-style-type: none"> • Can you make a general regulation that covers all injury, pain, distress for transport? • The farmer must retain the opportunity to remove a cow from his herd (i.e. transport it) once a cancer eye is noticed but before it becomes a problem so they don't have to get a vet out to certify it. A lower limit gives farmers the power to do this. • Concern that farmers may not be trained to recognise all these limits so a vet should certify borderline cases. • It doesn't necessarily always work the way that MPI thinks it does, transporters don't always refuse animals without a vet certificate. • Dairy farmers see their animals every day so would know if they have a cancer eye. Beef farmers wouldn't have as much of an idea. The general rule is that if cancer is spotted and is bigger than your thumbnail then get a vet certificate, and 95% of the time vet certificates are obtained. Drivers have been trained to say no to dodgy cases. Farmers may try and manipulate the loading so transporters don't see it. 	<ul style="list-style-type: none"> • May be able to pick up cancer eyes at 1cm on the side of the animal you see when milking but not the other side. Needs to be clear that unnoticeable cancer eyes will be able to be transported. • Concern that the way the regulation is worded would downgrade Act offences. • If animals previously had a nasty cancer eye but it was removed and has been healed, then this should be fine to be transported. • A lower limit should be based on whether it is confined to one tissue/the third eyelid. When it spreads to the upper or lower eyelid then it causes problems and can metastasize to other parts of the body and require the animal to be condemned. • Cancer eye is a major reason why vets are called out on farm to issue vet certificates, most farmers recognise that when they see a large cancer they will need a vet certificate.

Cuts and abrasions

Session One	Session Two	Session Three
<ul style="list-style-type: none"> • The transporter should not be held solely responsible. It should be put back on the farmer or the stock agent. They are the ones who know the true size of the animals and should ensure the truckie knows this when booking transport. The truckie shouldn't have to drive for hours to refuse cattle that are too big. • Who is supposed to foot the bill if a truck goes all the way to the farm and has to refuse the stock? • The distance travelled is irrelevant, it is more about the size of the stock. • The way the regulation is worded is going to capture abrasions on the hips of animals or other areas that have been damaged in transport, where this was intended to only cover back rub. This could include injuries from the race and pens. • If the truck has a bridge this can cause rubbing, may have to move to single decking. Less than 10% of trucks are without a bridge. • Crate standards are getting bigger and bigger, but stock are being bred larger and larger for commercial gain. There is a limit to how big these animals can get before they should not be transported. Suggestion that new crates are all bigger but some of the old crates are still small. • The stock drafter needs to be willing to make tough calls about when animals should be single or double decked or when they are too large. Can be fined for too large animals arriving at the works. Farmers should be able to trust their stock agents to make these calls. 	<ul style="list-style-type: none"> • What about depth of the cut? If it is a small cut under 50cm but runs very deep then would this be captured by the regulation? • This regulation may capture lesions/injuries that were previously caused on farm and had begun to heal but were ripped off in transport. <i>MPI response is that these kind of injuries should be adequately healed prior to transporting.</i> • If intending on targeting back rub then write this into the regulation. Although animals with severe cuts in yards shouldn't be loaded. • What about abrasions that aren't weeping, would they still be covered? 	<ul style="list-style-type: none"> • Cows may rub when they are on heat or have abrasions caused from being 'ridden' in very similar places to back rub. How can these be differentiated between? • Other animals, horses in particular, are not covered by this but they get severe tail rub. There could also be an issue with transporting deer as they brace themselves against the truck and get 'ass-rub'. • Confusion over whether this is referring to "must not transport animals in this condition", or "transport animals in a manner that causes this", is this concerning the drivers driving ability? • If animals have pre-existing scabs or healing facial eczema (FE) it would be very hard to tell if these injuries occurred beforehand or during transport. • This is an issue of poor transportation, not transportation on farm. It is a transportation issue if they don't have big enough crates to fit the animals in. • Could the size of the crate be regulated then? Could it state that you can't cart animals in containers that are too small for them?

Cuts and abrasions

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| <ul style="list-style-type: none">Fragmented cuts and abrasions that add up to a total of 50cm could be from a range of different things, not necessarily back rub. This is quite a different hurdle than one continuous abrasion/cut. The regulation clearly needs to state back rub if this is intended to cover back rub. If there are other injuries (e.g. a bolt etc. causing a cut) then the vet at the slaughter premises needs to have a conversation with the transport operator. | | <ul style="list-style-type: none">Need to be careful that we don't make such a tight regulation that a whole bunch of animals end up being left behind on farm for issues such as facial eczema that were intended to be culled (which may have resulted in better welfare outcomes for them). |
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Lameness		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> • Having 'evenly' in the regulation sets a very high bar for farmers and transporters. If an animal is even slightly lame then it will not be able to be transported. Not keen on this at all, as you can have perfectly fine animals that are unwilling to bear weight evenly. • It's totally impractical to meet the requirement for sheep to bear weight 'evenly'. There needs to be some kind of grading system for each species of animal if you're going down the grading route. • The pigs code says that pigs must just be able to bear weight on their legs, this sets a lower bar. • General agreement that the scoring system is too complicated, and being able to describe in words 'being able to recognise immediately that an animal is not bearing weight evenly', then this would be a better threshold. • An animal that is obviously limping should get a vet certificate, there are far too many of these showing up at the works currently. • An animal should be able to bear reasonable weight and walk on its own without being chased. Assessing animals in the paddock means that none will be missed. 	<ul style="list-style-type: none"> • Applying this scale to multiple species may be problematic as they may express lameness differently. • Would this include transport in smaller trucks or just commercial transport? This should cover horses in floats that are lame. • Would this cover animals being transported between grazing blocks and run off blocks/home farm? • Animals that have healed injuries and are lame from this but have learnt to live with it shouldn't be captured. • It is not acceptable to transport an animal with a severe historic injury such as a fractured leg/back. 	<ul style="list-style-type: none"> • Some support for the "bear weight evenly on all 4 legs" wording. • The NAIT number determining the distance travelled could be useful for this regulation. There should still be the option to transport an animal back to the home farm for treatment, or to a farm with the same NAIT number. • The old minimum standard is preferable compared to the proposed regulation which is confusing. Can be difficult to decide how to categorise lameness. • What would happen to animals that were bearing weight evenly when picked up but by the time they reached slaughter were not bearing weight at all? At what point do you decide the injury occurred? • This is potentially a huge issue for the sheep industry and special consideration should be given to this. It is impractical to require the same standards for sheep as cattle. There are exceptions for horses and deer, so sheep should be exempt. Biologically, sheep and cattle are different, therefore rules for lameness should be different. Could the Act purely be relied on for sheep? A thorough cost-benefit analysis between industries needs to be done. Favours "weight on all 4 legs" for sheep. • It is hard to justify in welfare terms why sheep and cattle should be looked at differently. This issue is reasonably cut and dried for deer – a lame deer is a lame deer. If they are being transported long distances then rubber mats or straw are used. • It is important that this regulation is very clear for farmers to easily understand their obligations and what needs to stay behind on farm for treatment. There may be an issue here with transport duration. There are some pretty awful cases that arrive at the works. • Concern that vets don't make animals walk when assessing for lameness, so if they certify the animal as fit for transport and then it arrives at the works severely lame they may get in trouble.

Pregnant Animals		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> • There should be an exception for animals that miscarry or 'slip' during transport. Stress of transport can induce miscarriage. An option could be requiring the animal born to be full term. • In some cases it may be in the animal's best interest to be transported late in pregnancy, such as a dry stock farmer selling cows to dairy, or when it is in their best interests to be milked. • Vets should be able to tell relatively easily if a foetus is not full term. • Pregnancy testing cannot give an accurate due date, it gives a 10 day to 2 week window of when the cow may calve. This becomes even more challenging in beef herds when mating is natural and not done via Artificial Insemination. There is a very wide window for natural births. • A standard or set of guidelines for fit for transport pregnant animals should be decided and put into regulation similar to the bobby calf regulations. • Foetal blood collection leads to transport at late stage of pregnancy. If you put premature births into regulation then it gets very complicated. 	<ul style="list-style-type: none"> • There should be a definite exemption for miscarriages and for offspring that were not carried to full term. • Common sense judgement call - this should only be applied to intentional late transport, not animals that you don't realise are pregnant. • What would happen if an animal gives birth within 24 hours at a sale-yard? • This should be extended to 48 hours, or should exclude transport within the last 10% of pregnancy. 24 hours seems too soon. • In dry stock they are mated for 3 cycles (60 days) which means calving could be spread. A 6 weeks prohibition on transport prior to the expected due date may be too long a time for beef cattle due to the unpredictability of calving. • The Transport Code of practice says no transport 6 weeks prior to birth, so why is 24 hours being targeted here? 	<ul style="list-style-type: none"> • If they give birth during transport then this is not okay, but if animals give birth within transport to the home farm then this should be okay as they are equipped to handle this. • This should be carefully considered in the context of sheep. If a hogget gets in then potentially a large number of ewes will get pregnant and the farmer wouldn't know. • An inspector may not be able to identify if a calf is full term or if it was premature, this needs to be clear before this is written into the regulation. • There should be an exemption for emergency adverse events. • Once an animal has calved it is straightforward to tell if it is a full term calf or not, but prior to this it is very difficult to tell when the animal will give birth. This may be 2 weeks, may be 2 days. • The standard practice for deer is that they are not sent for slaughter after 1 October as you can't be sure of the due date.

Horns and Antlers

Pain relief		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> MPI - Identified 4 methods of pain relief: <ul style="list-style-type: none"> Vet administers the pain relief Veterinarian Operating Instructions (VOI) Animal consult with pain relief administered by farmer Animal consult with pain relief administered by third party. Summarised feedback from consultation: <ul style="list-style-type: none"> Non-vets – not able to access drugs from vets in all circumstances Non-vets – costs vary across the country Vets – not all vet practices are comfortable with providing Restricted Veterinary Medicine's (RVMs) to non-vets. Most common reason that there would be issues for the vet in providing access is when there is a lack of familiarity with the farmer/contractor. This can be improved through ongoing discussion and familiarity with the process. Plenty of models available before the VOI became available, and there were few issues with farmers accessing medications. Access became easier as vets became more familiar with it. Need to train those that will use pain relief – don't think that the infrastructure to support this will be in place until 2018. Confusion about what pain relief is – vets are likely to think that it is sedation and Local Anaesthetic (LA) at a minimum – vets unlikely to give sedation to non-vet. A 'traffic light' system could be used to provide guidance on what the different levels of pain relief are and what the minimum requirement is. Using dentistry pain relief is a good analogy for different types of pain relief. Metacam provides good cover for pain afterwards but is not enough to cover the pain at the time of the procedure. 	<ul style="list-style-type: none"> There may be some extra work needed to educate veterinarians and make them more at ease with prescribing anaesthetics to farmers. They have spent many years educating veterinarians about the strict requirements for putting drugs on farms which will have made them more wary about prescribing them. A VOI will be used more for third party situations where a contractor will be administering the anaesthetic, and therefore these may be more rigid. This would be the best way for a farmer to access drugs to pass onto a third party. A farmer could get authorisation for the drugs from the veterinarian and to administer it themselves, before the third party performed the procedure. They also highlighted that there would need to be a reconciliation system for veterinarians to understand how much of the drug is being used, in what circumstances, and to prevent the use of it in other procedures that have not been authorised by the veterinarian. Need to have pain relief for these procedures as it is becoming an international expectation and New Zealand does not want to fall behind in the market. This is as much a market perspective issue as it is an animal welfare issue. A suite of rules should cover all situations, so that one group is not unfairly penalised. There will be bigger industry buy-in if all systems are simple and easy to use and understand. All of the potential issues with pain relief need to be 	<ul style="list-style-type: none"> Some of the problems around access to pain relief are a result of the fact that non-vets are in competition with vets. There will need to be a longer lead in because there will be a need to build relationships so that there are systems in place where a person can reasonably get drugs. Need to clarify what is meant by pain relief – for some that means sedation and non-steroidal anti-inflammatory drugs NSAIDs. Need to make sure that the definition of pain relief doesn't preclude the use of novel medications or prevent innovation e.g clove oil research on kid goats. The current definition of pain relief would effectively ban the use of caustic paste because the procedure takes place over a week and the local anesthetic wouldn't last that long. The use of caustic paste is undesirable. There is a significant risk that we would drive the increase in the use of caustic paste. The action of caustic paste takes place over a long time rather than suddenly. Less than 2% of people use caustic paste now, but others will start using it if they have to pay more for another method of pain relief.

Pain relief

- Practicality of pain relief and storage
 - Needs to be stored at less than 25 degrees, out of sunlight and where it is not susceptible to shaking.
 - Farmers already have storage for antibiotics etc. which will be adequate for these drugs
 - There are concerns about leftover anaesthetic because there are farmers who will try and use it for other procedures that they haven't got approval to use it for.
- Costs:
 - Some comment that there would not be much difference in the cost of the drugs – more likely the difference related to the service provided with the drug.
 - Examples were discussed that there are differences of up to \$150 for the same size drug across the country
 - The farmer can take the prescription elsewhere and the vet has to ethically provide it.
- Relationships are key between vet and farmer/contractor – the longer they work together they will know their capabilities and less will be needed to prove their capability. As time goes on the issues will flatten out. Would hate for this process to be stalled because there is a view that vets won't give out the drugs.
- VOIs do not apply necessarily to the vets clients as such, and can be geographically wide spread. We don't want a vet giving drugs to those very far away, but if it's not available in one area and the operator is reasonable, then it could stretch.
- If it's a farmer doing his own 50 calves then it's not reasonable to have to be checked every year, the cost doesn't justify them doing their own calves. It works fine for operators because they will be doing lots.
- In the terms of the farmer they will have the relationship so it may not be that they have to the checks every year.

- solved before the regulations are implemented, otherwise farmers are going to be less willing or able to comply.
- They also agreed that there needed to be a significant amount of time given to allow the upskilling of farmers and for relationships with veterinarians to be established, but also thought that regulations were the quickest way to signal to farmers that these were the expectations.
 - There was agreement from the group that pain relief would ideally be used in all painful procedures, but were concerned with the potential barriers they would face in implementing the regulations.

Beef v Dairy

- The beef and dairy industries are very different, with different market drivers. The beef market has not yet signaled a need for pain relief.
- Concerns were expressed that regulations would take away a 'premium product' where beef farmers can charge a premium over others because they use pain relief in their animal husbandry.
- The beef industry is also mostly polled and only occasionally have a horned animal. There is a big difference between a herd of dairy cows (which are used to being handled) and the occasional beef cow which is not. In these scenarios there is a potentially big cost difference for a relatively low animal welfare benefit.
- The market or even some farmers may struggle with why different standards for beef and dairy cattle exist. There is a lack of integrity in a regulation that says an animal in one system can

Pain relief

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| <ul style="list-style-type: none"> • The farmers who are isolated and only do a small number of calves every year, may only see vets twice every year. These people will get hurt the most by proposal because they can only afford so much and getting the vets out would be a huge cost. Only getting training at one time of the year could be unfair too. • There are ways to provide training for disbudding throughout the year. For example, a vet could keep calves heads in the chiller and these could be used for training at any time. • Recourse options if can't get drugs: <ul style="list-style-type: none"> - The vet has final responsibility / decision – but complaints can be made to the Vet council - best way for contractor is to get VOI • How quickly can a complaint / issue be resolved: <ul style="list-style-type: none"> - VCNZ - the second opinion would be from another vet, but a phone call to the Vet Council to talk about what is going on and then talk to the practice about what is going on. It is not necessarily a complaint process more of a discussion to sort out the issues. - VCNZ: there are lots of reasons why the barriers need to exist, there needs to be training for the people as well. • Timeframes: <ul style="list-style-type: none"> - There was concern that this should not be pushed through in 2018 because the proposals are tricky and we need more discussion. MPI noted that there was the deadline of 2020, but VCNZ wanted it made clear that 2018 may be too soon. | <ul style="list-style-type: none"> • be treated differently than the same animal in a different system. • There was also concern that the regulations were originally intended to move existing standards in codes of welfare under the Act, but these regulations are raising the standard and this will unfairly penalise the beef industry. MPI noted that the codes had signaled that pain relief was always desirable and some of the barriers that existed at the time of making the codes (e.g. perception) were beginning to be removed. • MPI stated that the desired outcome is the same for both industries, but acknowledged that it may be achieved at different paces because of the difference in systems. • Are some of the problems around access to pain relief a result of the fact that non-vets are in competition with vets? • There will need to be a long lead in time because relationships will need to be built and there will need to be a system in place so people can reasonably get drugs. • Discussed Danish hot iron cautery and how the animal does not feel pain – Others argue that you can damage the surrounding tissue, but you can do that with local anyway. • Dehorning goats is not very common. | |
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Disbudding		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> Some people use crates for disbudding but apply the local before they crate them. Others don't use crates for disbudding. Data shows that 80% of calves on dairy farms are disbudded by contractors. This is good because it has contractors doing a number of the calves, there is a business model for them. But recognise that there needs to be options for farmers who will need to do it. This an easy group to regulate as long as the contractors are trained. Can this proposal be worded are a bit clearer, can we please make it more similar to the Laparoscopic Artificial Insemination proposal? Several people said that MPI needs to make it clear that pain relief can be easy to include in their disbudding routine, and that systems can be developed to ensure anaesthetic is accessible, otherwise there may be less compliance. Another complication could be dairy farmers deciding not to disbud calves because it is too much of a hassle before they send them to beef farms, which could increase the number of animals that need to be dehorned in the future. This was seen as a negative animal welfare outcome because dehorning is considered a more traumatic procedure than disbudding. International requirements for pain relief differ across the board. Action: MPI to follow up on countries' industry bottom line in terms of pain relief requirement. <p><u>Different methods of disbudding</u></p> <ul style="list-style-type: none"> In Denmark pain relief is not required for calves up to 4 weeks of age with Danish flat iron method. The younger they are, the better. They have no stress signals. It takes 5 seconds per horn. If the hair catches on fire when you put it on then it is too hot. It should leave a hazelnut colour on the skin, and cannot go into skull, just completely flat on top. The moment the iron goes on it kills the nerves so no need for a pain relief jab. There is a study in Denmark that showed that local or general cause greater stress in the next day than if there is none used for this procedure. Request that we will look at his research and look into whether procedures can be exempt from the requirement for pain relief. Some people indicated that they use a tool that looks similar to the Danish flat iron. Caustic paste: 	<ul style="list-style-type: none"> In the dairy industry 80% of calves are disbudded by contractors, which makes this an easy group to regulate as long as the contractors are trained. There was agreement from several participants that MPI needs to make it clear that pain relief can be easy to include in their disbudding routine, and that systems can be provided where anaesthetics are accessible, otherwise there may be less compliance. Another complication could be dairy farmers deciding not to disbud calves because it is too much of a hassle before they send them to beef farms, which could increase the number of animals that need to be dehorned in the future. This was seen as a negative animal welfare outcome because dehorning is considered a more traumatic procedure than disbudding. The international requirements for pain relief differ across the board, as states are still in the midst of figuring out a system to require it. Action: MPI to follow up on countries' industry bottom line in terms of pain relief requirement. <p><u>Different methods of disbudding</u></p> <ul style="list-style-type: none"> It was stated by one participant that in Denmark a flat iron may be used without pain relief under four weeks of age. 	<ul style="list-style-type: none"> Discussed Danish hot iron cautery and how the animal does not feel pain – Others argue that this method can damage the surrounding tissue, but you can do that with local anyway.

Disbudding

<ul style="list-style-type: none"> - A study shows that caustic paste is a painful way of disbudding. Caustic paste gets rubbed on other calves, and on udders when still nursing. - Some people have had to clean up calves that were poorly done with caustic pastes, and the pain just seems to go on and on. Have seen calves missing half their faces. - Caustic paste is an approved product under ACVM, VCNZ is reviewing the product so it may be decided that it is not approved in the next few months. - Caustic paste is generally used in the beef industry. But the feedback from farmers who do use it is that they put tape on it for the first hour and then it falls off, but after that there is no paste left. - Done properly with proper pain relief (i.e. sedation and analgesia) there are indications that it is the best way to do it. - It may be about proper training, but drugs shouldn't be available over the counter. - It's cheaper as well so very attractive to farmers. Also there are less horned animals, they are generally polled so on some farms it is only the odd horned animal. • When asked if pain relief was required for all methods of disbudding, it was noted that there was a Massey professor who was of the opinion that all methods have some degree of pain associated. If peer reviewed science confirmed this, people would be happy to agree – but this science does not exist yet. • The science is complex, but at the end of the day, insult to tissue is still an insult. There are also issues with subsequent pain, and in the future this should be addressed as well. • The vets at the table had issues with the use of caustic paste and considered that it is an unreasonable means of disbudding. The procedure takes much longer which means that local anaesthetic does not cover it properly, and there are issues with it rubbing off on udders, other animals, or being licked off by other calves. • Risks associated with the use of local anaesthetic were also discussed, with vets stating that there are potential issues with the local anaesthetic being administered wrong. But as long as the person administering is competent, there should be limited risk. <p><u>Competence</u></p> <ul style="list-style-type: none"> • Training seems to be the biggest issue. • From a compliance perspective we need the ability to track that people have followed the proper steps. 	<ul style="list-style-type: none"> • It was noted that there is a Massey professor who is of the opinion that all methods have some degree of associated pain. • Peer reviewed science is required to confirmed this, but this science does not exist yet. • The science is complex, but at the end of the day, an insult to tissue is still an insult. There are also issues with subsequent pain, and in the future this should be addressed as well. • The use of caustic paste is an unreasonable means of disbudding. The procedure takes much longer which means that local anaesthetic does not cover it properly, and there are issues with it rubbing off on udders, other animals, or being licked off by other calves. • Risks associated with the use of local anaesthetic were also discussed, with vets stating that there are potential issues with the local anaesthetic being administered incorrectly. But as long as the person administering the drug is competent, there should be limited risk.
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Disbudding

- Queried the role of vets. Are the vets there to test the ability of the person to administer the drugs, or the farmer's ability to perform the procedure?
 - Training of a farmer to perform the procedure is beyond the VOI, it should focus on the administration of the pain relief.
 - VOIs facilitate the transfer of a drug to a non-vet, you have to make sure that the farmer can administer the drugs. You don't want a lay person to administer the drug for a procedure that will cause the pain even if administered right.
 - Need to test it on calves to make sure that the local is working.
 - This could run into the issue of having to wait for calves to be on the ground before the training can happen when ideally they want them to be trained before the season.

Goats

- Farmers will most often be disbudding the goats, because they will probably be better than the vets. Methods used include: hot irons, caustic paste. Pain relief is not used at the moment, maybe some Metacam.
- We do about 4500 kids, and about half of those are with local. Whether pain relief is used is based on past experience (one participant was trained to use pain relief) and the goats scream, scream less without pain relief. There is a 50/50 saline option which means that they hurt less and pain relief works.
- Vets are happy with the technicians/farmers disbudding goats themselves with pain relief.
- Meat goats farmers are disbudding goats themselves and without pain relief.
- Using irons – the iron need to be very small, it needs to be done at a young age and they scream less without pain relief.
- AgResearch is researching the use of general anaesthetics on goats.

Dehorning

Session One	Session Two	Session Three
<ul style="list-style-type: none"> • MPI question – In the beef sector when are farmers likely to see the animals? <ul style="list-style-type: none"> - It will vary. Ideally if cows are from the dairy industry they will have already been disbudded. Need to ensure that we do not make disbudding too hard so that people don't do it before they send cows off to beef farms. - Dehorning can go on at basically any time. There is a perception in the industry that up until 6 months of age they are disbudding when really they are dehorning, so lots of education is needed in this space. • MPI: Is it possible to differentiate between tipping and dehorning? <ul style="list-style-type: none"> - Some participants were concerned about how you discern what the tip is? - Sometimes it is hard to tell where the tip is. - More information is needed re: physiology / anatomy - it would be nice to have this defined - If you've got fully grown horns then there will not be much available to tip at all, but in regrowth you will have quite a lot of leeway. • Could stock agents have some sort of requirement that they will only buy dehorned animals? <ul style="list-style-type: none"> - A lot of stock agents are saying they don't want them if they're not dehorned. • MPI: summary – <ul style="list-style-type: none"> - we would like to be able to define tipping, but we need to get more detail around whether that can be practically defined - Practicalities for pain relief need to be considered and there will need to be significant lead in time - Need to look into goats more. 	<ul style="list-style-type: none"> • No discussion. 	<ul style="list-style-type: none"> • Goats are not commonly dehorned.

Develvetting		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> • MPI Question – do we need to specify the vet’s competence to give approval to develvet? <ul style="list-style-type: none"> - If a vet isn’t competent in this procedure then they shouldn’t be able to authorise it. This should be done under an authorised programme. (Note: the current DINZ programme is a good template for other areas like disbudding and dehorning). - The difference between develvetting, and disbudding and dehorning is that develvetting is harvesting a food and there is a monetary value for velvet. This is not the case for disbudding and dehorning. - Don’t think that it will be necessary to include a requirement for the vet to be competent. Competency isn’t an issue at the moment. - If a vet made a false declaration about their competence then they would be in trouble and would be penalised. • MPI Question – are there any issues with regulating polling a fallow deer using a rubber ring so that you don’t get the antler growth? <ul style="list-style-type: none"> - This is not a common procedure anymore and the number of fallow deer is diminishing so this may not be an issue. - Note it stops growth completely in fallow deer but doesn’t do the same in others - so it is quite different. - Research is species specific <p>[Following the session DINZ noted problems with the 72 hour requirement as it extends the hours between velveting and slaughter].</p>	<ul style="list-style-type: none"> • Not discussed 	<ul style="list-style-type: none"> • Not discussed

Ingrown horns		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> • It was noted that there are differences in the definition of ingrown horn in different proposals – MPI notes this should be the same. • How are you going to enforce ‘having’ an ingrown horn? In many cases they won’t be seen as compliance officers are not on farm. • We would prefer the use of Section 130(b) notices where the penalty is failure to treat. If a farmers hasn’t seen the animal yet it’s not fair to penalise them. With the transport one, making sure there is an exception for on farm transport is important because it can be problematic accessing vets. • Maybe this should be picked up as a transport issue because we are signaling this issue out and there are others that are just as significant. • It is unfair to pick this up as a transport issue because then the transporter gets pinged for having an animal with an ingrown horn on the truck – in the dark and rain it is hard to see if a horn is ingrown. • It’s about management and making sure that someone has taken all reasonable steps to ensure that they are following the rules. But we need to discuss what those reasonable steps are, what should average compliance look like? • Disagree with talking about making farmers compliance ‘average’. These regulations are to make people have excellent animal welfare standards. • We don’t think there is a need for regulation 35 (transporting an animal with an ingrown horn). They can be picked up through transport, but that means 	<ul style="list-style-type: none"> • There will be issues creating fair standards for both the dairy and beef industries. A dairy farmer should have less leniency as they see their animals daily, but an in an extensive system a farmer may not see their animals for such a length of time that the horn is truly ingrown by the time they see it. • The onus should be placed on a failure to treat an ingrown horn, because a farmer may not see it until it is already ingrown at which point they will have unknowingly committed the offence. • What happens if an ingrown horn turns up in a sale-yard? If MPI Compliance is informed they would go back to the farm the animal came from to assess what was going on there. If it had gone to the sale-yard then the farmer should have had enough time to notice it was there. • There will still be the ability under the Act to prosecute in serious cases. The regulations 	<ul style="list-style-type: none"> • The regulation would require someone visiting the farm for inspection or a member of the public reporting the ingrown horn for it to be picked up and enforced. • This regulation could also be used on an animal that has been picked up at the processors as it is clearly something that happened on farm and not during transport. • Is it possible for this to be left out of regulation, as there is already the transport proposal and it can be dealt with under the Act if severe? • There would be benefits to having both the on-farm and transport regulations go through to cover all scenarios, but it would need to have operational procedures in place to decide how they would be used. • Why aren’t there regulations covering the other transport issues such as cancer-eye. MPI responded that it can be difficult to identify whether a person had attempted to treat cancer-eye or mastitis, whereas it is black and white whether an ingrown horn had been treated or not. • Will transport to slaughter be a reasonable way of dealing with an ingrown horn? MPI responded that part of the issue is that transport exacerbates the problem, and so using that as a solution is something we are trying to move away from. • Ingrown horns would happen only occasionally on extensive farms as they are polled, but there could be issues with badly disbudded calves coming from the dairy industry. • If disbudding becomes difficult due to extra cost and time from pain relief, the dairy farmer will be less likely to disbud before they pass on the calves to a beef farm, and there will be more issues with ingrown horns.

Ingrown horns

you can only do something if you intend to truck it. The issue is ingrown horns which can be treated on farm.

- Why are we only picking out ingrown horns?
 - Ingrown horns are a problem at the works and it is easy to tell if it has been treated or not.
 - Why can't you educate people rather than regulate for issues on farm?
 - You can educate people up to a point, but then there are those who don't care and won't make a change unless you enforce the rules.
- If an ingrown horn is identified at plant, any responsibility should go back to the farmer.
- For the more serious cases, then you still have the option of going under the Act.
- If proposal 33 says if you find an ingrown horn it must be treated, under what situations will a vet give a certificate for transport under proposal 35?
 - A vet might provide a certificate in a situation where the animal is going to the works because there is no other option but for it to be killed.
 - if there is a vet exemption for proposal 35 then it contradicts proposal 33.
- There are a number of other situations where an animal shouldn't be transported, which are not being covered in the regulations. How are we going to educate them, how are we going to ensure that people know they have to comply with all of them. Education needs to be available at the time that the regulations come into force?

should be used to deal with the 'middle-ground'.

Section 130(b)

- In terms of the different options for penalising the offence, it would be sensible to have a delay between the farmer seeing the ingrown horn and being penalised.
- Ideally a farmer should receive an order to treat the ingrown horn if they have only just been made aware of it, and then penalised if they fail to do so within the required time.

Tipping

- The participants agreed that having tipping as a practical solution to ingrown horns would be beneficial. However, they were unable to provide physiological markers for the correct place to tip due to differences in age or species and potential complications from deformed horns.
- More information will be needed to develop standards around tipping.

- Participants agreed that a farmer shouldn't be penalised for simply having an ingrown horn, but rather failing to treat it once they have seen it.
- Some queried whether an extensive farm would even have the facilities to dehorn. If the farmer brought the animals back to the home paddock they will often have better facilities than a dairy farm to perform the procedure. This is true especially when they are brought in for pregnancy testing, TB testing, weaning, or changing bulls around. This would be a time that we would expect the farmer to see the ingrown horn, and also to have the facilities to deal with it.

Tipping

- It was noted that there is no easy way to define the tip of a horn. Some people understood there was a colour difference at the tip, but some vets stated that this was not always true. It is dependent on species and age. The tip of the horn may also have rubbed away causing colour differentiation.
- Removing the ability to tip without pain relief would be problematic - even if it causes bleeding it will cause significantly less pain than leaving it in.
- There was consensus that tipping was less painful than dehorning as it causes a much smaller lesion, and was analogous to trimming horse hooves which can sometimes bleed.
- In the USA they use the diameter of the horn to decide where it can be tipped but that is only useful for cattle and potentially only one type of breed.
- Does tipping happen in the goat industry? It was suggested that it would not happen often as most kids are disbudded.
- The idea that an ingrown horn could be removed at a maximum distance from the injury to relieve the pain and distress rather than waiting to dehorn it was raised. The participants thought that this was a promising idea and that it needed to be investigated further.

Ingrown horns		
Bleeding horns and transporting an animal with horns		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> No discussion. 	<p><u>Animals with bleeding horns and antlers</u></p> <ul style="list-style-type: none"> There was concern about how this regulation would be enforced in terms of identifying when the damage happened. There will be situations where an animal walks off a truck and it may be difficult to establish whether it happened on-farm or during transport. <p><u>Transporting an animal with horns</u></p> <ul style="list-style-type: none"> There was some concern about the wording of the proposal focusing on a horn causing bleeding, as there are other injuries that an animal can sustain that are just as bad but do not bleed. These injuries need to be accounted for as well. Injuries such as bruising or internal bleeding are sometimes hard to attribute to horns, as it may be the loading or the transport itself that causes the damage. 	<p><u>Animals with bleeding horns and antlers</u></p> <ul style="list-style-type: none"> Some participants had an issue with the use of the word 'unstable' as this would include scurs. Scurs are regrowth which don't attach to the skull and do not cause pain. It was suggested that 'broken' should be used because this at least refers to an injury, and even if healed they can get knocked and agitated again. A scur is hard to differentiate visually from a broken horn. The definition of unstable needs to be clarified further. It was noted that an unstable horn will still be somewhat attached at the skull, whereas a scur never attaches. <p><u>Transporting an animal with horns</u></p> <ul style="list-style-type: none"> It was noted that the definition is different for the two ingrown horn regulations and MPI confirmed that they will make this analogous – they will refer to actually causing inflammation rather than just touching. The whole issue around ingrown horns should be dealt with in one package. Some participants thought that the exception for transporting an animal with an ingrown horn should be removed as they could see no situations where a veterinarian would issue a certificate for that. The majority of participants agreed that if one of these regulations needed to be removed it should be the transport one as they saw an ingrown horn as an on-farm issue.

Electric prodders		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> Difficulties with moving stock depends on the person handling the stock. Young yearlings for some people could still be a challenge. Need to consider that people need to move stock within a reasonable amount of time. Think it's good but wording should read you can only use an electric prodder if you are going get injured. At the end of the day you've got to move animals to farm. With stock if nothing's working, an alkathene pipe should be used. We don't want to use tails to move stock anymore because of the risk of tail breaking. On perception basis, using a stick to try move an animal will look worse than an electric prodder. Suggested that it might be better to go through a whole list of particular situations. It is not clear – each time you have to use a stick and make noises and if that doesn't work use the prodder? The intention is that electric prodders should be used as a last resort. These are used mostly for loading cattle The issue is that for the cattle it's a novel experience so they're in a stressed environment (stock transport) and that's largely when a prodder will be used. When you need to get the stock loaded and keep the flow. Anything up to 200kg. Most of the problem is older stock not wanting to flow but the last thing you want is someone getting frustrated because they react and get stressed. I have seen stock drivers go nuts and make the whole thing worse. The original proposal was 100kg but the vast majority of feedback was that the weight was too low. I think it's good at 200kg but if the process is going to be a nightmare then you should be able to use it to keep things moving along. Why just cattle over 200kg? Pigs for example are large animals and the same difficulties apply to loading them to slaughter and some of them are as strong minded. 	<ul style="list-style-type: none"> 200kg is not appropriate. A lot stock moved are 100kg. What about zoo animals? This would be covered by issues relating to imminent threat. Straight breed calves may range in weight from 150kg to 250kg but there's a large proportion that are under 200kg. Those cattle may only ever been handled 1 -2 times. They may be hard to handle. If you've got electric prodder you're likely to use electric prodder. We need to keep it at 100kg. What about specifying a purpose? Some calves at rodeos are 100kg but they're only little. Prodders should hardly be used - only if there are down cows that won't move. We should be able to use prodders on pigs. What is the alternative? Bit of pipe? Beating a cow? Electric prodders are not a bad thing in that case. 	<ul style="list-style-type: none"> We have concerns about the weight limit. It depends on the person dealing with the animal. Smaller people may have issues. We were relaxed with 100kg. Suggested rather than weight, use should be related to the circumstances. E.g. only used for unloading and loading animals only. And for imminent threat. If this is just about loading and unloading you would be able to use prodders on bobby calves. If industry wants 100kg, as a vet I would back that. Small animals you can move reasonably easily up to 200kg. Above that they need more persuasion (vet). A 190kg weaner still has a lot of power, they're not small. You could have 200kg docile animal or 150kg animal with fire in its eyes that will damage you. The 200kg is probably relevant but not relevant in terms of statement on the real perceived risk to your life. I was sure that the earlier codes didn't restrict to cattle only. The proposal means you can routinely use on cattle 200kg and above but can also use them on other animals if deemed necessary in terms of threat to life. So this doesn't stop people using prodders where there is a life threatening situation. This would be a defence. The defence should be written in the regulations. There are lots of the other proposals where this defence applies too. We don't actually state it but it's always there under the Act.

Electric prodders

<ul style="list-style-type: none"> Proposals are based on existing minimum standards in codes of welfare. Some research also suggests that pigs are far more sensitive to electric prodders. In practice, where other methods have failed, the use of a prodder in well trained hands is appropriate. In particular to be able to reach forward and prod the pig that isn't moving. There was some concern about the numbers of submissions - 93% that supported the proposal. Does this include public and advocacy submissions? MPI confirmed that submissions from all groups are considered. I do not support the change from 100 to 200kg. We were content with 100kg. Are you going to publically consult on this change? You don't know if there's a significant change perspective on 200kg. How are we going to get an animal to move? What options are farmers are left with? MPI confirmed that there is no intention to consult publicly again on the proposal. An increase in weight can make a material difference in this proposal. Use on pigs - I understand farmers don't use them. Sometimes the truck driver has them. What are the options, if focusing on prodders because of their potential to cause pain, what can be used? Agree with the requirement that they be used on the muscled hind quarter because you want them to move forward. If you want to prevent cruelty and abuse, multiple use is something you need to think about. There is always a defence that all reasonable steps were taken to comply with the regulation (including that use was necessary for the safety of the handler). This is probably the proposal where it is most important that spell out in the regulation that it is a defence to use a prodder for safety reasons. I've seen it used is on a down cow where it may be dangerous to get a rope. It's in the best interest of the animal that the prodder be used. You should be able to use a prodder if it is of benefit to the animal. Dairy farms tend to use more hip clamps. 	<ul style="list-style-type: none"> Agree that prodders should only be used on muscled area of hindquarters of the animal. When loading you're behind them. In terms of sufficient room – what if there's a chain of cows? If you prod the last one then not going to be moved along? We need an exception for health and safety. We'd want to use it. 200kg is a bit arbitrary. The other option is to regulate on the use by the age of the animal. The intent of the proposal is that young and small animals are not prodded. You also need to think about excessive use. We have the mechanism under the Act to prosecute for excessive use. This is no different from saying that you can't use dog to shift stock. May need a training program to cover lots of things about the regulations including this. 	<ul style="list-style-type: none"> If there is an infringement regime and the enforcement person comes over with pen and paper can you justify it to them? With the bobby calves a few guys been given infringement, they just pay it because it's cheaper than defending it. With an infringement it will be clear whether it's happened or not. It's did something happen? Can talk to the officer and write to the issuing authority. Defending it in court a last resort. We've added the words that it must be used in muscled area of hindquarters any comments? Seems ok. In terms of when you are using it, it's been suggested that other methods have to be tried? That's problematic. Goats – what's acceptable? Because I've seen worse things using a stick. What about 'other more painful methods'? Use of electric prodders on goats is prohibited in codes of welfare. Vets said they think the intention is electric prodders should be used as a last resort – requirements around good stockmanship should be written in the proposal. We should be looking to design facilities that enables easy loading. Goats – I see people breaking tails – you can't just say 'use other methods' without qualifying that. If people carry an electric prodder it will be hard for them not to use it. There are different lengths of prodders. Electric gloves are used on calves. There needs to be at least one animal body length in front of the animal you want to move.
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Electric prodders

<ul style="list-style-type: none"> • Note that the more you try get an animal up the angrier and more dangerous it's going to become. May be better to stand behind and prod. • What's the rationale behind the increase in weight? Tried to base this on existing minimum standards which use a mix of weaned weight and age and submissions for all stakeholders. • We consulted on 100kg and overall submission said this was too low/ small. Including some industry submissions. • Any science on this? – We will reconsider science but this is not an exact science. • If you are trying to load a truck, you have to keep calves moving – if restrictions go through there are going to be problems with weaners up to that weight. • The tricky thing is we're trying to achieve minimal use and when it is appropriate. • Will you have to re-consult if the weight changes significantly i.e. 500kg? We are not considering a change that significant. • We feel that we need to approach our people again about the weight limit. • How are you going to determine the animal's weight? To some extent by sight. Some will be able to be weighed a slaughter premises. • Different stock will have different weights when loading stock we want to keep things moving. It's about responsible use and when it's necessary. • To be an infringement there needs to be a defined line. • We're going to have to be using fair bit of common sense with these regulations and develop an implementation plan e.g. including warning letters. • We have received submissions about particularly big stags and the need to use them occasionally on these. • Sheep – none over 200kg but there are studs where sheep are prodded. This is currently not allowed under codes of welfare. • Agree that the 100kg is too low. • Grower pigs get up to about 100kg but excess breeding stock – there is a big turnover they could be 200-300. 	<ul style="list-style-type: none"> • Some prodders have two second bursts. • The section about other methods must be tried first – that's got to go! 	<ul style="list-style-type: none"> • What about using them on a down cow? Can still be used on cattle just not small cattle. • It is definitely something farmers use to try and get cow up, if the cow doesn't come up it's going to die. • Some vets use it for neurological purposes on down cows to test nerves. This was used back in the day, there are other methods now. • Might not be able to get anywhere near a bogged cow so the other option is to shoot it. • Do handheld and fixed prodders at slaughter premises give a different shock? Depends –From the reaction of animals it seems the prodders at slaughter premises are less strong than the ones used on stock trucks.
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Use of goads		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> • We got a lot of feedback about that we may not have captured all the sensitive areas of animal. • Participants generally agreed that goad wasn't a common term that is easily understood. It was suggested the definition should be around an object that extends a person's body? • Note it's not just a stick or pipe, someone might pick up whatever is closest. • The pain and harm could be severe. • What about the risk of someone beating the heck out of an animal? Serious offending may still be prosecuted under the Act. • What about words around prohibiting people from repeatedly striking an animal without purpose. • This kind of offending would be considered for prosecution under the Act. We are also trying to prevent people striking animals in sensitive areas as they can be no legitimate purpose. • What if you poke or prod a bull in self defence? Like the other proposal preservation of human life can always be used as a defence. • In the dictionary goad is a sharp stick. • Now you are suggesting that the penalty be the same as for an electric prodder but isn't there an argument that goads could do more lasting damage. This depends on the circumstances, both electric prodders and goads can cause pain and distress. 	<ul style="list-style-type: none"> • We suggest that the term goad be replaced and the proposal talk about an object that extends the body such as a stick. • Why have noses and heads been left out? • Heads are often tapped e.g. to lift the head when drenching • Some animals need to be tickled. 	<ul style="list-style-type: none"> • The term goad is not well understood, we prefer a definition that uses an object that extends your arm. • A definition on google says a goad is a spiked stick. • The proposal is lacking something about intensity. – can cause more pain with pipe than a prodder. • Note that severe offending may be prosecuted under the Act. It may be a matter of judgement/the harm caused. • There needs to be consistency between this regulation and the electric prodder regulation. • Why not combine this proposal with the electric prodder proposal? • Electric prodders are different and are confined just to the muscled hind quarters of cattle, pigs and deer. • I think \$500 is appropriate based on submissions.

Cattle – Milk Stimulation

Session One	Session Two	Session Three
<ul style="list-style-type: none"> • Does this still happen? • We understand it's a historical practice but some people may still be doing it. • There was no opposition to banning the practice but some submitters wanted a prohibition on anything being put into a cow's vagina to stimulate milk. • What objects do people use? • Only Artificial insemination straws and seeders with controlled internal drug release (slow release drug) but these aren't for milk stimulation. • Some farmers use pacifiers –inserted into the anus. These are used as a way of calming an animal to stop them kicking. • Some concern that some people (activist) might think that legitimate objects being inserted (e.g. Artificial Insemination straws) might be for milk stimulation and report it • Only oxytocin or other registered medicines should be used for milk stimulation. • If the regulation only prohibits the use of water or air then there will be scope for other liquids or gases to be used if someone wanted to get around the regulation. • What if the proposal stated that only oxytocin or a registered medicine could be used? This would stifle innovation. • Other things may come out in the future which may be beneficial? At the moment it's just oxytocin but we don't want to make it illegal for anything else that may be developed. • Is there a need for this rule at all? • We have come across a couple of farms that have done it. You also see mention of it on trade me chat rooms and in social media chat. • How many cows usually need stimulation? • Around 10 out of 100 heifers. Have had previous years where they were addicted to it. It is variable. • Oxytocin is cheap, available, it works and it's pain free. • It will be more difficult for farmers if you bring the regulation in halfway through the season. 	<ul style="list-style-type: none"> • It seems evident that some people didn't even know that this is not good practice. • This is because some people think it's more natural than medicine. • What is a natural way? • Oxytocin is cheap, available, it works and it's pain free. • Farms these days are often run by one dairy worker and they come onto the farm with not a lot of experience. Need education. • Oxytocin economical. Farmworkers can be trained to use it. • The proposal should say nothing should be put up there for milk stimulation • Agree • Should apply to any object or substance. 	<ul style="list-style-type: none"> • Do water and air get inserted into a cow's vagina for other purposes? • It's unlikely to do that even for cleaning after birth. • Some people use pacifiers but that goes in the anus and doesn't stimulate let milk down, it makes them sit still. • If we made this regulation as worded do you think it will have any unintended consequences? • No.

Traction in calving and lambing

Session One	Session Two	Session Three
<ul style="list-style-type: none"> • Vehicles are probably used more than we realise • Motorised winches should also be prohibited • I used winch once but it was messy and it damaged the winch • Most people out there calving are on their quad or two wheeler bike. Unless they are in a Ute, which has a winch on it, I don't think it is that common. • Jacks and winches can be applied and let off quickly, they put strain on then stop. The problem with electric and mortised winches, is you can't release the tension quickly. They wouldn't work and could cause significant damage to the animal. • May need to use vehicles and motorised winches as a last resort, when the calving jack is broken. • Stationary vehicles are commonly used as an anchor. • The proposal doesn't prohibit the use of stationary vehicles. • I have heard that there have been some rare instances where a rotary platform has been used. It's the motorisedness – the ability to stop and control the process that is the issue. • Would it be better to turn this around and say only use a jack? • Pulleys and ropes are used as well. Better to prohibit what is causing the issue. • What about sheep? Motorised mechanism should never need to be used –ever. • This should include all bovine animals such as buffalo. • The potential to do significant harm to the animals seems very high so why are you putting this in regulations and not just leaving it to be an Act offence? • If the outcome of the offending is that extreme harm was caused to the animals we may still take a prosecution under the Act. • If the penalty is higher it might be more of a deterrent. • I've had calves in the past that seemed like they weren't coming and got a few people to pull. If it's late and you're physically tired you can't do it. Better to gently give the quad some gas to help. If you wait for vet the calf might be in paralysis at that stage. That would be my concern with ramping up the fine. • This may mean more animals need to be shot. • How will this be enforced? • We rely on people reporting incidents. If someone videos an incident or if someone comes in and tells us something happened then compliance will go talk to the farmer. • If you do it wrong it will mess the cow up. • Good to have the regulation as a signal. Not going to see many examples. My biggest concern is people seeing a stationary vehicle being used and thinking it is against the regulations. • Can a vet tell after the fact if a vehicle or mechanized winch has been used? No. everything is bruised anyway. 	<ul style="list-style-type: none"> • There are multiple options to deal with difficult births, still have caesarean and euthanasia. • If you get the quad out it's not going to end well. This could apply to any pulling device without a quick release system. I have seen damage done. A calving jack has quick release. • Suggest 'quick release of tension' wording be used in the regulation. • If the cow and calf are relatively unharmed then a prosecution could be taken under the regulations. If the animals are harmed then a prosecution could be taken under the Act. • It is important that stationary vehicles are allowed to be used as an anchor. 	<ul style="list-style-type: none"> • There can be significant damage to the animals when you cannot relieve the pressure. • Whatever is used should be designed for the purposes of calving. • Sometimes you have to use what you can make do with • There will need to be clear evidence for a prosecution to be taken • Goats and other animals such should be included in this regulation. • Consultation on including other animals would need to be undertaken • Deer need to be included.

Teat Occlusion		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> • This would be a prosecutable offence because it is classes as a surgical and painful procedure. • Most people supported the proposal but a lot of people wanted a total prohibition on occluding teats. Want to make sure we don't capture any legitimate occlusions. We want people to stop using rubber rings and superglue. • Temporary occlusion the teats are present, permanent occlusion the teat is removed. • Teats are often removed due to mastitis or where the teat has been ripped and the vet has removed it. • We should be prohibiting using a short term seal, so that the udder builds for the purposes of showing the animal. The seal is then taken out. This practice is out-lawed in some places. Steps being taken to stop it already but it would be good to have a regulation. • Columbus plugs are used for therapeutic purposes. • There must be registered things to use. • Not sure what organic farmers use as sealants? • What about squeezers being used to remove teats? • Having this regulation out there will send a good message. • Teat sealant is expensive at about \$6 a cow. • It will be the works vet who will pick up offending. • Need to be clearer about temporary versus permanent teat occlusion. Occlusion versus removal. 	<ul style="list-style-type: none"> • The proposal needs to define therapeutic purposes. • Iodine should also be captured as it destroys udder tissue. (Ablating teats – vet participants offered to provide further information). • This proposal should cross reference blocking via rings. • I don't think this is suitable for an infringement. A recent court case on the use of rubber rings on teats resulted in a fine well over \$1000. 	<ul style="list-style-type: none"> • There are issues obtaining sealant– you are required to have authorisation to use it • If it's registered you can use it • Some people are using teat sealant for shows. It makes the udder swell up. • Is the intent of regulation about permanent teat occlusion? • What about chemical ablation? This doesn't seal the teat it destroys the quarter. • People use iodine and they used to use formaldehyde • The proposal should say 'either temporarily or permanently' • Should the regulations read 'you should not insert any substance in the teat that isn't a registered sealant? This would cover the mutilation of the quarters. • There are other ways to treat udders that we wouldn't want to prohibit. • The difficulty is wording. This would have to be carefully worded in terms of the purpose for which the procedure is designed. • It should be a prosecutable offence. Must not insert anything in the teat to cover 1) temporary 2) permanent 3) exceptions to 'treat'.

Cattle – Tail docking

Session One	Session Two	Session Three
<ul style="list-style-type: none"> • I have docked tails at times where cows have come in with cut tails and there has been blood everywhere. I might do it twice a year. It wouldn't be a good use of a vet's time to come and do something pretty similar when it seems like a simple solution. • An emergency provision is needed. • If you come across a herd of cows and half of them have their tails removed and the farmer says they were removed as a result of emergencies then you know that's not right. • You should be able to use a rubber ring, above the lesion. • What would a vet use? I'd use a rubber ring. If you've put it on you need to leave it there. • If you don't treat it, it will make a mess and potentially the cow will get an infection. • I have had cows' with eczema where the tail got an infection so the bottom bit is all shriveled up. • If a cow gets a paralysed tail and can't lift it you can also get a difficult situation too. • This proposal is stronger than the code. Most submissions supported this. Very few submissions were made that said you should still be able to dock tails. Suggested there needs to be lead in time because procedure still being undertaken. • Agreed. Docking is not widespread anymore but we still need lead in time. • We understand that about 1/3 of dairy farmers are switch shortening. • When would this be implemented? We are aiming for implementation at the end of the year. • We will have a bunch of people on the farm who will dock tails before the transition to the new rule. • Quite a bit of education is needed in our section so about two seasons of lead in time is required. So that everyone will at least know. • Will there be an age limit? No. • How is it going to be enforced? A lot of cattle have shortened tails already. This will be prosecutable offence so it will have to be proven in court. If half a herd has shortened tails – this will set off alarm bells 	<ul style="list-style-type: none"> • Surely this is the same as any other injury. Better to deal with it than it becoming something that needs therapeutic treatment and antibiotics. • A high proportion of our people want to dock it themselves if tail is ripped • There is potential that if you allow for tail docking it will be used to conceal tails broken deliberately. • Some farmers will not support this proposal particularly around prohibiting the removal of the tail switch. Especially true in Southland where it is really muddy or where the winter crop where it gets muddy. They do it to keep the animals clean. • Trimming the hair off is good. • It is estimated that it will be 7-10 years before the cows that have been legitimately docked will be out of the national herd. • This should be black and white – you can't do it anymore • Less than 1 percent of farmers totally dock tails (rather than shorten) • Quite a lot are shortening tails so it will take a reasonable amount of time to shift practices. 	<ul style="list-style-type: none"> • I have docked tails in an emergency. • You need to get a vet out to do it. • Allowing farmers to dock for emergencies opens up a defence that can be problematic with regard to deliberate tail breaking. • Tails can self-amputate • MPI – how would you treat a damaged tail? • The vet participants were asked how you would treat a tail injury. Some said amputate with pain relief, other said rubber ring with pain relief • Can't see a justification for an emergency situation. You should call a vet. • Suggest the wording be clearer to say shortening is prohibited for any part of the tail. • There is no need for a phase in time the dairy industry has been talking about this for years. • Some calves born in 2016/17 will have shortened tails. It will take years until this flows out but it will be audited on farm basis and if calves have

Cattle – Tail docking

- The new regulations will result in more work to clean up. Requiring more people.
- The reason most people dock is that it is annoying – getting dirty tail in your face.
- This was also done to manage leptospirosis back in the day. It's a hangover from then.

- Lots of farmers will complain about not being able to switch.
- This will be prosecutable offence.

shortened tails it will be reported to MPI.

Cattle and sheep – castration and shortening of the scrotum

Session One	Session Two	Session Three
<ul style="list-style-type: none"> Assume science confirms that this worsens depending on age. Yes. Should burdizzo use be prohibited? Some science from the UK indicates that using a burdizzo is more painful than a ring but not as bad a surgery (about halfway between these methods). High tension bands is the method that 'cranks up' the pain. I would say they should be prohibited. Some people also use a hot knife on lambs. Under the Act any surgical castration would be vet only unless regulations provide otherwise. Any other methods people have heard of apart from rings, bands, burdizzo If burdizzo are currently legal and you've not got evidence to prove they're bad, may need to leave these as an option. Most beef cattle farmers will do it at 2-3 months of age. At 6 months it's becoming a safety issue on beef cattle. Sheep are castrated at around 8 weeks. From a management perspective there are people on beef farms who are struggling to get it done within the 6 month period. 6 months also corresponds with some other legislation e.g. tagging Over 6 months you need pain relief? Does that mean the vet can come out and if they are happy the farmer is capable of doing it they can provide them with enough local for the animals they need to do? Similar to the dehorning process. If farmer is suitably qualified and vet is happy. Does this wording allow non-surgical castration up to age of 6 months? Under 6 months you just can't use high tension bands. Rubber rings is fine. It was originally worded that 'conventional rubber ring must be used' but submissions came back and said 	<ul style="list-style-type: none"> A burdizzo crushes the testicles. This is not a good method. Farmers should be able to castrate, they'll do it as quickly and as good as any vet. If some methods are banned and pain relief is required prohibited behaviour may fly under the radar. It would encourage some people to get these things done sooner. If farmers want to do this over 6 months of age they have to be competent and have approval. It doesn't say anything about competence in the over 6 months bit. Agreed proposal should be consistent. 	<ul style="list-style-type: none"> Some people say high tension bands are currently used without pain relief because they are available and they will use them for animals over 6 months. High tension bands are far more painful than rubber rings. Why not say that high tension bands are prohibited? There is a difference in terms of pain between high tension bands vs rubber rings. What about other things similar to high tension bands? It's the mechanical tightening that's important – may be prohibit a device using mechanical tightening. What about a burdizzo, and crushing and biting? Why not say sheep 3 months or 4 months? Sheep aren't done at 6 months. Sheep in the high country may be done older - it's very specific to that. Calves too. What about goats – we haven't consulted on goats so they are not included in the proposal at this stage. All the codes and science say the younger the animal the better. I suggest 3 months for lambs and 6 months for calves. Farmers feel as though they should be deemed suitable, they have the skills and should be able to do castrations at any age. Depending on if vet deems them suitable. If there are issues (e.g. a bleeder) then vets have the equipment need to help the animal.

Cattle and sheep – castration and shortening of the scrotum		
<p>just ban what you don't want people to use rather than stifling innovation.</p> <ul style="list-style-type: none"> • Some people still bite them off. This is not common. • A lot of submissions called for pain relief at any age but we are not pursuing that as we understand it is not practical. • Is the infringement per animal? Yes but it depends on the number of animals involved. A prosecution may be sought • This may increase farm costs – if they need to get a vet to castrate bull calves over 6 months old but regulating would encourage people to get it done earlier 		<ul style="list-style-type: none"> • Surgery is better for the animal than high tension bands. • If you are going to prohibit the use of high tension bands you should do it for all animals of all ages. • Some vets want to use high tension bands. • Number 3 – would cover the biting. A knife or similar device to perform the procedure – that would cover biting too.

Sheep – Mulesing		
Session One	Session Two	Session Three
<ul style="list-style-type: none"> • This has changed a little bit. This proposes a complete ban. All methods. • The quicker this stops the better. I can't see any reason to do it for therapeutic purposes. • This will ban clamping and cutting. • We are fully supportive. • Is it used much in breeds apart from Merino? Not in NZ but it is in Australia. 	<ul style="list-style-type: none"> • No issues with this proposals 	<ul style="list-style-type: none"> • The proposal needs a full stop after 'method' there is never any reason to remove a skinfold!! • Vets don't want therapeutic mulesing. • We have heard anecdotally that there are organic farms that are still mulesing so we think it may be still happening.

General comments on implementation:

- Regulations should not be implemented half way through a season.
- You need to look at the farming practices around each proposal to determine when the regulations should be implemented i.e. Dairy farming - 1 June. Some proposals need to start a bit earlier to make sure they're implemented before the activity starts on farm.