

**Animal Welfare (Equines) Code of Welfare**  
**Summary of Submissions from Public Consultation**

**General Comments**

No.	Comment	NAWAC Response
6	<p>Since we made our first submission we have been approached by a research unit looking at setting up a donkey milking business. The project has been shelved for now but may rear its head in the future. The prospect of donkeys becoming industrial animals or unwanted foals being bred for profit makes the Code of Welfare even more important for our breed into the future.</p> <p>Donkeys are often kept (in the USA) with flocks of sheep that they have bonded with so that they kill any coyotes; this does not mean that they are aggressive towards humans. They may also freeze when scared, earning them an unwarranted reputation for being stubborn. Such behaviours need to be understood by owners. Donkeys are thinking equines and very intelligent.</p> <p>A major welfare issue for donkeys is the jacks being sold ungelded by the breeders. They are often sold to new donkey owners who find their quiet little donkey has grown into a strong male. These jacks are sometimes beaten by owners trying to dominate them. Some of our members do rescue work and ungelded jacks are our biggest problem.</p>	Noted
8	<p><b>Supplementary material regarding welfare issues in horse sport.</b> There is a strong need for scientifically substantiated education to improve horse training and welfare in recreational and sport horses.</p> <p>Areas of concern:</p> <ul style="list-style-type: none"> <li>(a) Training methods that are detrimental to the horse, specifically those that do not allow the horse to remove pressure applied</li> <li>(b) Riders using cruel equipment</li> <li>(c) Unfit horses, not ridden during the week then taken on fairly gruelling recreational 'trail rides'.</li> </ul>	Noted

	<p>The submitter has included photographs taken of horses while using a training technique called “Rollkur”, “hyper-flexion” or “LDR (low, deep and round) This type of training is allowed in New Zealand and a recent study showed significantly higher salivary cortisol concentrations after horses were ridden in this frame [paper cited in submission].</p> <p>A photo is also included of examples of chain bits, legal for show jumping in New Zealand.</p> <p>There are several measures that could be introduced to assist with attainment of appropriate horse welfare in sporting situations such as:</p> <ol style="list-style-type: none"> <li>1. Additional regulations as to what constitutes acceptable bits and equipment in New Zealand</li> <li>2. Mandatory horse welfare officers at horse sport events</li> <li>3. Adoption of best practice using scientifically substantiated findings such as those from ISES (International Society for Equitation Science). For example, ISES have introduced a taper gauge which can be used to ascertain that horses’ nosebands are not over-tightened</li> <li>4. Prohibition of rodeos in New Zealand.</li> </ol>	
11	<p>I would like to oppose the draft submission that you have provided. I agree there should be some guidelines, but more emphasis should be on educating people upon the care and welfare of horses.</p>	<b>Noted</b>
12	<p>Overall, we were very impressed by the thorough and detailed nature of the code document, particularly the general information, recommended best practice and example indicators. We have some changes we would like to put forward, but commend you on creating this code for the protection of the horses of New Zealand.</p> <p>Our remaining concern is how this code, once implemented, becomes common knowledge in the equine industry. As recreational horse owners, and also contractors in the racing industry, we have never sighted nor been made aware of our obligations in terms of animal welfare. We would like to support this code of welfare becoming common knowledge, and are eager to disseminate the information in the most effective way.</p>	<b>Noted</b>
10	<p>I rely on the advice of the qualified Animal Control officer at Gisborne District Council, VetEnt Gisborne, as well as experienced local handlers. I live in a very isolated and rural part of the East Coast here where horses are used in farming work as well as</p>	<b>Noted</b>

	<p>for recreation. A large number of the population are on the benefit and therefore have limited funds which naturally impacts on the ability to provide “qualified” care + advice in relation to all animals. People here continue to work with horses in pretty much the same way as previous generations. A code should be able to be clearly understood by anyone. As a novice myself, I tender these humble opinions (mostly on terminology and ease of understanding).</p>	
13	<p>Overall we think NAWAC has done an excellent job however we did receive one comment that the code is attempting to be a textbook and there is a risk that by attempting to cover many areas, readers may be turned off reading it. We realise it is a difficult task to reach an optimal amount of information.</p> <p>A further general comment is that there is quite a lot of repetition amongst different parts of some sections.</p> <p>There are also a number of grammatical errors which we have not specifically identified all of them.</p>	Noted
14	<p>The SPCA wishes to commend the writers of the draft discussion paper, for a practical approach to the many issues faced by persons who are owners or who are in charge of the various Equine breeds.</p> <p>The complexity of the many varied situations that can occur when keeping or using Equines both in private and industrial situations have been generally recognised; although the SPCA believes that some parts of the Draft code are not sufficiently robust. We will therefore address those particular areas.</p>	Noted
16	<p><u>The continued over-reliance on a very large number of “Example indicators” to assess compliance with Minimum Standards</u></p> <p>The Draft Code contains sixteen Minimum Standards with sixty-seven requirements that must be met. It is further proposed that evidence for compliance or otherwise with these standards will be assessed by ninety four “Example indicators”. The Federation reiterates its comments, in an earlier submission [see Page 5 in the Federated Farmers submission to NAWAC on the “Public Draft - Animal Welfare (Transport Within New Zealand) Code of Welfare)”, 2 December 2009], that the introduction of such measures (<i>example indicators</i>) provides several grounds for concern, including:</p> <p>(1) That while there can, on occasion, be a need for such “Indicator” information, its widespread use reflects a lack of clarity in the wording of the minimum standards. It would be far better to specify minimum standards unambiguously.</p> <p>(2) There has been no cost-benefit (or any other) analysis provided to justify the necessity for the use of such indicators; and</p> <p>(3) That the introduction of such indicators will likely result in farmers and other stakeholders having to compile exhaustive</p>	Noted

records as an animal welfare risk mitigation measure. 3

It is unclear to the Federation if any thought has been given to how the example indicators can or would be practically measured or assessed in a way that would be of value in respect of legal proceedings, for example "Handlers" behaviour towards equines is patient" (page 7) and "Foals are not weaned until they are receiving at least 75% of their daily feed requirements from solid feed" (page 24). The Federation believes that if an indicator value cannot be written in a way that is unambiguous and is not open to individual interpretation then it should not be included in a Code of Welfare.

A lack of focus on working horses in the code

It appears that the practicalities of working farm horses have not been particularly well covered in the code. The Federation is happy to engage around the development of codes so that such omissions are rectified in future publications.

## Specific Comments

	No.	Comment	NAWAC Response
<b>Title</b>	<b>1, 2, 4</b>	<p>The title of the Code should either be Animal Welfare (Horses) Code of Welfare or Animal Welfare (Equids) Code of Welfare.</p> <p>It is generally accepted that the term 'horses' applies to all members of the horse family including donkeys, mules etc.</p> <p>'Equine' is an adjective meaning 'horse-like' and its use in the title is inappropriate. The name for all animals of the Family Equidae is 'equid'. I accept that this term is not commonly used, but the term 'horse' is generally used for all members of the Equidae, so I suggest that the title of the Code refer to 'Horses' not 'Equines'.</p>	<p><b>Disagree – but title changed</b></p> <p><b>Noted</b></p> <p><b>Disagree – but noted</b></p>
1.1	13	Replace 'Efficient' with 'Effective'. Efficiency doesn't necessarily imply quality.	<b>Agree - changed</b>
1.3	6	<b>What animals does this code apply to?</b> This code should also apply to any donkeys being farmed for donkey milk. The jennies' welfare and protection as well as that of their foals is essential.	<b>Agree – the code covers these animals</b>
1.5	6	<b>How does this code relate to other codes of welfare?</b> Include – equines used for the production of milk for commercial purposes.	<b>Disagree</b>
2.1	6	Include that handling of donkeys and their foals used for commercial gain should be carried out by people knowledgeable about the care and health of donkeys, and the handlers should be experienced. The recommendations for horses should also apply to donkeys being farmed.	<b>Agree – the code applies to these donkeys</b>
	7	<b>Introduction: Paragraph 1. “It is necessary that personnel working with equines possess a knowledge of their needs and behaviours”</b> Rather open. It is not unreasonable to say 'comprehensive knowledge'.	<b>Disagree</b>

	13	<b>Introduction</b> 'personnel need to have an ability to observe them'. What does this mean?  Last paragraph: Replace 'veterinary surgeon' with 'veterinarian'.	<b>Has been reworded</b>  <b>Agree - changed</b>
	7	<b>MS 1</b> What is a sufficient number? Rather open and needs more definition (for example, a sufficient number to ensure the code is met).	<b>Disagree</b>
	16	<b>Example indicator</b> The first indicator value (page 6) is a nonsense as it restates the objective of the code rather than providing a way by which the achievement of the objective (or not) can be assessed.  The fourth indicator value listed is " <i>Evidence of training/competence ... and knowledge of how the actions how the actions of persons in charge may affect the animal welfare can be demonstrated</i> ". This value is a repeat of the second indicator value and should be removed.	<b>Agree – removed</b>  <b>Agree - removed</b>
	7	<b>General Information</b> Perhaps reference to some weblinks to such organisations website would be useful here.	<b>Disagree – not in the code</b>
	9	<b>General Information</b> the NZEHA recommends the following current wording: ' <i>Further information on the care of different equines is available in booklets published by the New Zealand Equine Research Foundation, which are tailored around the care, health and welfare of horses in the New Zealand environment, or by contacting an equine veterinarian</i> ' would be more appropriately worded as follows: 'animal health professional, veterinarian, reading booklets published by the New Zealand Equine Research Foundation relating to care of equines'	<b>Disagree</b>
2.2	7	<b>Introduction: Paragraph 1.</b> "knowledge of appropriate handling...." Should be a comprehensive knowledge  <b>Paragraph 2.</b> "Equines pushed past their level of capability..." Does this need a definition?  <b>Paragraph 3.</b> "Responses may include aggression, biting and kicking" should be "aggressive threats, biting and kicking"	<b>Disagree</b>  <b>Disagree but moved to section 6.</b>  <b>Agreed – but moved to section 6</b>
	7,9	<b>Introduction: Paragraph 3.</b> The concept of 'wilfulness' is unscientific and outdated and should be removed.	<b>Agree - removed</b>
	7,9	<b>Introduction: Paragraph 3.</b> "Behaviours such as pacing, weaving and crib biting are more commonly	<b>Moved to section 6 and text</b>

	<p><b>associated with boredom or obsessive compulsive behaviour”</b> should be “...are commonly associated with poor welfare resulting from poor management practices (for example, extended periods in a boring, confined environment such as a loosebox) ...” Current science does not really support the concept of OCB in animals</p> <p>The NZEHA sees ‘obsessive compulsive behaviour’ as a human medical term and suggests instead ‘displacement activity’.</p>	<b>modified</b>
13	<p><b>Introduction last paragraph</b> ‘...seek advice from a person experienced in equine behaviour.’ Suggest examples of who they may be, as we probably don’t have anyone registered as such in New Zealand.</p>	<b>Disagree – but changed to ‘person experienced in equine handling’</b>
7	<p><b>MS 2 (b)</b> The term force used here worries me. What do we mean by ‘force’? It is rather undefined and vague- and quite negative. It is more scientific and modern to talk of pressure and release in training and handling equines (i.e. operant conditioning with negative reinforcement).</p> <p><b>MS 2 (c)</b> Should say “and/or injury”</p> <p><b>MS 2 (f)</b> Bit vague. What is excessive? And where should it be used- not enough just to state not head or genitals. Needs guidance on where whip should be used (if used at all).</p>	<p><b>Agree – MS removed</b></p> <p><b>Disagree – injury mentioned in MS already</b></p> <p><b>Text modified. Disagree – whips are used for many different purposes on different parts of the body</b></p>
14	<p><b>MS 2 (d)</b> The SPCA commend the blanket ban of the use of electric prodders on horses and wish to comment that where good stockmanship and good equine handling techniques are applied, there is absolutely no need for the use of prodders.</p> <p><b>MS 2 (e)</b> Whip is an all-encompassing generic word which could be seen to cover all variations of whips, from stock whips through to the very light-weight riding crops and dressage whips.</p> <p>In the event that a “stock whip” was applied directly to an equine, an offence under the provisions of the Animal Welfare Act would most likely be committed. It has to be acknowledged that there are still a small number of country stockmen who muster cattle and sheep on horseback and still use stock-whips as a tool in their mustering and driving of sheep and cattle.</p>	<b>Noted</b>

	<p>It is respectfully suggested that the minimum standard be amended to make it clear that a “stock whip” must never be used in the vicinity of an equine which has not received desensitising training in respect of the use of a stock whip.</p> <p>It is further suggested that the term “whip” as used in the draft code, be extended in such a manner as to clearly differentiate between the various types of whip. This would probably require the naming of most popular usage whips.</p>	<b>Disagree</b>
9	<b>MS 2 (e)</b> The NZEHA recommends it would be appropriate to smack a horse on the nose when it has inappropriately bitten a handler and that the word ‘object’ should be replaced by the word ‘device’ in case a ‘hand’ is viewed as an object.	<b>Disagree</b>
12	<b>MS 2 (f)</b> change to “The whip, <i>lead or any other object</i> , must only...”	<b>Agree - changed</b>
9	<p>Age is referred to in two other indicators for minimum standard 2. The NZEHA recommends the level of maturity is a more appropriate factor when determining if horses are ready to work. The NZEHA suggests re-wording to:</p> <ul style="list-style-type: none"> <li>• Equines are introduced to basic training and are backed, or started in harness, at a suitable level of maturity</li> <li>• Equines are not asked to accept practices and perform procedures prior to the level of maturity where they are able to physically and psychologically cope with what is being asked of them.</li> </ul>	<p><b>Agree – changed</b></p> <p><b>Agree - changed</b></p>
7	<p><b>Example indicator “Equines are introduced to basic training and are backed, or started in harness, at a suitable age”</b> Can this age not be stated? Otherwise, what is suitable? General practice is 3-4 years old.</p> <p><b>Last example indicator</b> should say physical or psychological injuries</p>	<p><b>Disagree – text changed</b></p> <p><b>Disagree – text changed</b></p>
9, 13, 16	<b>Example Indicator ‘Equines are relaxed in human contact and do not show abnormal fear of humans’</b> Does not take into account horses that have never been handled before (e.g. Kaimanawa horses) or where mistreated animals are helped. These horses are not relaxed in human contact but this may not be a reflection of the competence of the owner i.e you cannot use the horse’s behaviour as a consistent indicator of handler competence.	<b>Agree - deleted</b>



	<p>Suggest this is deleted.</p> <p>[see also example indicator in 2.1].</p>	
8	<p><b>Example indicators “Equines are trained by competent persons using positive reinforcement techniques”</b></p> <p>The current wording leads people to think that negative reinforcement is not desirable in horse training. This is not the case – negative reinforcement is used consistently in horse training (<u>removal</u> of pressure as close as possible to when the targeted response occurs). The sentence is confusingly written in a way that seems to be aiding the common confusion between “punishment” and “negative reinforcement”.</p> <p>[This submitter includes references to the work of Professor Paul McGeevy and Dr Andrew McLean on positive and negative reinforcement in horse training].</p>	Agree - changed
13	<p><b>Example indicators</b> ‘backed’ should be defined in the glossary.</p>	Agree - added
14	<p><b>Example indicators</b> It is submitted that a minimum age limit of 1 year, for the initial “backing” of equines, be inserted in the “Example Indicator” section of Minimum Standard No 2. Although some training is undertaken with equines younger than 1 year, even the Thoroughbred industry does not “back” equines younger than the submitted age of 1 year.</p>	Disagree – but outcome based EI included
7	<p><b>RBP (b), (c) and (d)</b> This should be a minimum standard!</p>	Disagree
9	<p><b>RPB (c)</b> discusses the use of the whip when riding a horse but does not take into account the whip when used by handlers on the ground or by drivers in buggies and sulkies. In these situations the whip used is often quite different and some distinction about the types of whips used and in what situations would be prudent here. The NZEHA suggests (c) be prefaced with the words ‘When riding, the whip should be only used.....’</p> <p>Many of the member organisations of the NZEHA have specific rules around the use of the whip. There are a range of whips in use including padded whips, which are mandatory in thoroughbred racing, and driving and lunging whips. Lunging whips for example are flicked towards the horse usually without the intention of contact but to communicate that the horse must maintain forward motion. This communication may be viewed by some as coercion. For this reason the NZEHA wishes to remove the words ‘coerce performance’ from <b>RBP (d)</b>.</p>	Noted – Disagree - but changes made to this section to reflect this intent

13	<p><b>RBP (c)</b> Do we have equine behaviourists in New Zealand?</p> <p>Suggest 'back up' is replaced with '...whip should only be used as an aid to reinforce the leg or voice command...'</p>	<p><b>Text modified</b></p> <p><b>Disagree – but text modified</b></p>
8	<p><b>RBP (d)</b> “The whip should not be used to coerce performance...” This is <u>exactly</u> what a whip is used for. Perhaps clarity of use is required, as in its current form this statement would necessitate banning of whips from horse sports. My view is that the whip is OK when used appropriately as a training aid.</p>	<p><b>Text</b></p>
12	<p><b>RBP (d)</b> Change to “The whip <i>or spurs</i>”.</p>	<p><b>Text changed</b></p>
8	<p><b>General information</b> “Thoroughbred racehorses, as early as 15 months, often have small, light riders on their backs in order to race as 2 or 3 year olds” This age should be raised. I am opposed to the age being set at 15 months and to racing gorses as 2 year olds. [Reference to paper by Michelle Reed , <i>Physical stresses encountered by two year old Thoroughbred racehorses whilst undergoing intensive training</i>]. Research has found that a significant number suffer dorsal metacarpal disease and there are high wastage statistics for young racehorses.</p> <p>Add: Rest Days – Horses in work should receive at least one day off a week.</p> <p>Additionally, it would be beneficial to have guidelines or minimum standards of the number of hours a riding school or trekking equine performs in a day and in a week.</p>	<p><b>Disagree – this is general information - but an EI included to indicate that horses need to be of an adequate maturity</b></p> <p><b>Disagree – but MS included that horses must not be overworked</b></p>
13	<p><b>General information</b> ‘three’ and ‘four’ should be ‘3’ and ‘4’</p> <p>Suggest the Equine Training Organisation is included in 2<sup>nd</sup> paragraph.</p>	<p><b>Disagree</b></p> <p><b>Disagree</b></p>
15	<p><b>General information</b> the NZPCA recommends the following addition after the paragraph detailing NZQA qualifications: <i>The New Zealand Pony Club Association (NZPCA) also provides training programmes for Riders and Parents as well as specific programmes for Coaches that includes 6 levels of Coaching Certification. Further information on the programmes provided by NZPCA can be found on their web site: <a href="http://www.nzpca.org">http://www.nzpca.org</a></i></p>	<p><b>Disagree</b></p>

	14	<p>It is submitted that in respect of small equines, those for example of less than 11 hh, a maximum weight limit for any rider should be set.</p> <p>While it is acknowledged that many equines such as Welsh Mountain ponies have the ability to carry or haul very significant loads, the emergence and popularity of miniature ponies has increased in recent times. The possibility of a person weighing 100 kilograms or more, attempting to ride a miniature pony of 11hh or less, for “a bit of fun”, needs to be addressed.</p> <p>SPCA submits that an <b>Example Indicator</b> restricting the weight of a rider of any equine of 11hh or less to a maximum of 60 Kilograms should be inserted.</p>	<p><b>Disagree – but an MSs included to state that horses must not be worked at an intensity to cause pain.</b></p> <p><b>Disagree</b></p>
2.3	6	<p>Donkeys form a strong attachment to a particular donkey friend and effort should be made to keep such a bonded pair together.</p> <p>A sheep or small animal is not always a suitable companion for a donkey as they may act aggressive towards them.</p>	<p><b>Text added to reflect this</b></p> <p><b>Disagree</b></p>
	7	<p>Would it not be possible to provide information on what makes good fencing and what kind of fencing isn't suitable- e.g. barbed or high tension wire is not suitable for horses.</p>	<p><b>Information, MS and RBPs on fencing included in section 4.4</b></p>
	13	<p>The last paragraph of the Introduction is repeated as MS 3(c). There is also some repetition between the Introduction and MS 3(d).</p>	<p><b>Agree - deleted</b></p>
	7	<p><b>Introduction: Paragraph 2. “Tethered equines have some other particular requirements that must be met in order to ensure that their needs are met.”</b> Requirements should be listed</p>	<p><b>Sentence deleted</b></p>
	8	<p><b>MS 3 (e)</b> Horses are flight animals, designed to roam and therefore should not be tethered AT ALL, but certainly not for 15 hours in duration. If tethering is maintained as an acceptable practice, I propose that the maximum length of time is no more than 8 hours.</p>	<p><b>Disagree</b></p>
	13	<p><b>MS 3 (e)</b> What is the basis for 15 hours being the maximum time a horse can be tethered? We note in the Code of Recommendations and Minimum Standards for the Welfare of Horses, there was a requirement for inspection at</p>	<p><b>Disagree</b></p>

		least twice every 24 hours.	
13, 14	<b>MS 3 (d)</b>	What does general surveillance mean? Needs clarification.	<b>Disagree</b>
16	<b>MS (d)(i)</b>	states “Equines that are restrained by tethering must be ... placid and trained to the conditions”. Either a horse is trained to the conditions or it is not –and it is unclear what “Placid “adds to the code. In a similar vein, if an animal is being trained in respect of tethering, how will an animal owner avoid being in contravention of MS 3(d)(i)?	<b>Agree – deleted</b>
	<b>MS (d)(ii)</b>	states “Equines that are restrained by tethering must be ... provided with constant access to palatable water, sufficient food and effective shelter”. This – and in particular the absolute requirement for “effective shelter” does not cater for circumstances where a farmer is using his horse (eg in the South Island high country) and should be reworded as “Provided with access to sufficient water, food and shelter”.	<b>Disagree</b> <b>Disagree</b>
9, 13	<b>MS 3 (f)</b>	sets an age of 2 years before which tethering should not occur. The more important factor is covered in (d) (i) and this is that horses are trained and placid to the conditions. The NZEHA recommends age is not included as this is too arbitrary a guideline.	<b>Disagree – but MS included that they must not be tethered if physiologically compromised</b>
14	<b>The SPCA is opposed to tethering as a form of permanent containment.</b>	<p><u>The SPCA is opposed to the tethering of equines for any length of time greater than 3 hours, unless the tethered equine is under the direct supervision of a person who is deemed to be in charge of such equine.</u></p> <p>The SPCA acknowledge that an equine will have to be tethered for periods of time during grooming, whilst receiving veterinary attention, whilst being administered farrier work, or at various equine sport events, etc.</p> <p>In a number of areas, particularly in rural New Zealand, SPCA animal welfare inspectors have encountered situations where the predominate form of restraint and containment for equines is by tethering.</p> <p>Senior SPCA animal welfare inspectors have reported incidents where equines have received serious rope burns, broken legs and other injuries while being tethered on a long term basis. The same Inspector reported that he had to destroy another equine where the tethering rope had become embedded in its neck. That particular animal exhibited such a high level of distress that it had to be destroyed with a firearm, to end its suffering.</p>	<b>Disagree</b>

	<p><u>It is respectfully submitted that prohibition of tethering as a method of permanent confinement should be included in Minimum Standard No 3.</u></p> <p>It is further submitted that it would be very useful for a definition of tethering to be developed. Such definition could break “tethering” which is currently seen in very broad terms, into a number divisions, which could be addressed separately.</p> <p>There are methods of tethering which are used to restrict an equine within a fenced area. One of those methods is for an equine to be tethered by a rope to a rubber automobile tyre. The purpose is to prevent the equine from jumping its boundary fence, or to stop it galloping around expansive areas and/or upsetting other animals or stock with which it may be grazing.</p> <p>SPCA acknowledges containment difficulties faced by some equine owners. It would be simplistic to say that people should not have animals for which they cannot properly provide, in this instance in terms of sufficient land and suitable paddocking.</p> <p><b>Direct Visual Supervision:</b></p> <p>The SPCA have made it clear that we are opposed to tethering of equines for long term containment, but we respectfully submit that if the National Animal Welfare Advisory Committee intends to allow the continuation of tethering for the long term containment of equines, that a clause requiring “Direct Visual Supervision” of tethered equines every six hours, be inserted.</p>	<p><b>A definition for tethering has been added to the glossary</b></p> <p><b>Noted</b></p> <p><b>Noted</b></p> <p><b>MS included that tethered horses must be kept under general surveillance</b></p>
10	<p><b>Example indicator 1, 2</b> Should “horses” be “equines”? Unless ponies, donkeys and cross-breeds have higher night vision? Equine is used in the later points.</p>	<p><b>Disagree</b></p>
13	<p><b>Example indicator 2</b> does not relate to the Minimum Standard. Travelling horsemen do this routinely and will rely on the owner of the paddock to provide a safe secure area. Suggest delete or amend to ‘Horses are only introduced to a new paddock in the dark, which is known to be safe, secure and free from hazards.’</p>	<p><b>Agree – text modified</b></p>
7	<p><b>Example indicator “Equines that have been tethered during the day are placed in a paddock or loose box overnight”</b>. What size of loosebox is appropriate?</p>	<p><b>Disagree – not relevant here</b></p>

		<b>Last example indicator</b> Add “and have access to suitable shelter from sun and inclement weather.”	<b>Disagree</b>
7, 14		<b>RBP (a) and (f)</b> should be minimum standards	<b>Disagree</b>
14		<b>RBP (f)</b> Hobbles are a tool which can be used by a veterinarian or a farrier, when treating an equine or when administering farrier work. When used for such legitimate reasons, those professionals administering the work will be present. There can therefore be no reason whatsoever for hobbles to be used on unattended equines.	<b>Disagree</b>
8		<b>RBP (f)</b> Include that a horse should only be hobbled on a suitable surface e.g. grass or sawdust, never on concrete or gravel, as a fall on these surfaces can “break” the horses knees, scarring them for life and inhibiting normal function.	<b>Disagree</b>
10		The code says that Equines should not be tethered “unless absolutely necessary”, and “not longer than 15 hours”. This is a contradiction.	<b>Much information is provided in this section to outline the inherent risks of tethering.</b>
7		<b>General information</b> “ <b>equines can also live with companions such as sheep, cows or goats.</b> ” This seems a little old-fashioned and unscientific. Do we have any evidence that these species provide significant social support? Would be much better just to say equines require the company of others of the same species. [also in section 4]  “ <b>to prevent persistent jumpers escaping from paddocks,</b> ” In this case this would be long-term use and hobbles should not be used. Other solutions would be required here - long term hobbling is not appropriate.	<b>Disagree</b>  <b>Agree - removed</b>
9		<b>General information</b> discusses the use of hobbles but does not include reference to harness racing where their use is not aimed at achieving good restraint but rather as an aid for gait. The NZEHA recommends the last paragraph in 2.3 General Information begins with the words ‘Hobbles <i>applied below the knee or hock</i> can be used...’ and that the glossary be amended to differentiate between hobbles applied below the knee and hock.	<b>Disagree</b>
9, 13		Section 2.3 General Information also suggests post and rail fencing is less suitable for donkeys, suggesting that donkeys will chew through rails quicker than horses. The NZEHA advises both horses and donkeys chew wood	<b>Agree - removed</b>

		fencing and question the usefulness and inclusion of this sentence.	
	13	Recommend that '...they need to be sufficient distance away from each other so that the tethers cannot become entangled' should be a minimum standard.	<b>MS added to this effect</b>
2.4	7	<b>Introduction. "Likely to cause chaffing, burns and abrasions."</b> Should say friction	<b>Disagree – but text modified</b>
	8	<b>Introduction last paragraph</b> I agree that halters shouldn't be left on in paddocks as best practice. Sometimes, however, it is necessary to do so. Please add the ROPE HALTERS MUST NOT EVER be left on in the paddock – as they cannot break if caught on a fence or branch.  Ideally any halter left on a horse should be pliable, flat leather or nylon with a break-out clip (capable break if put under pressure).	<b>Disagree</b>
	13	The first paragraph in General Information repeats some of the last paragraph in Introduction.	<b>Agree - removed</b>
	9	<b>MS 4 (b)</b> there are wide and diverse views on what constitutes 'Equipment that is severe.' The NZEHA's position is that it is better to pre-empt argument and focus on the outcome; accordingly, minimum standard 4 would be better worded as follows; 'Equipment is not used in a manner that results in pain or distress.'	<b>The word 'severe' has been removed from this section</b>
	14	<b>RBP (d)</b> This recommended best practice in respect to the removal of covers on a minimum weekly basis should include words to the effect of " <u>--- to also enable the physical body state of the covered equine to be examined</u> ".  Where equines are covered for lengthy periods of the year (particularly during winter), the presence of dermatopholis, serious rubbing; and loss of body condition will be concealed by the presence of a cover. The removal of the cover will also enable these other conditions to be observed, if they exist.	<b>Disagree</b>  <b>Noted</b>
		<b>RBP (g)</b> The desirability or need to leave halters or head-collars on equines which may be difficult to catch when turned out, is understandable. However, there have been situations where a head-collar or halter, has been left on a growing foal which has been turned out for a lengthy period of time.  In the case of █████ v █████, a head-collar was left on a foal and was unchecked for a period of 9 months, during	<b>Noted, but not practical for the code - disagree</b>

		<p>which time the head-collar became imbedded into the jaw of the foal by several centimetres, as the foal grew. Upon conviction in the [REDACTED], [REDACTED] was disqualified for a period of 20 years and fined \$10,000 for this and another animal welfare matter on which he was prosecuted.</p> <p>SPCA contend that the reference to equines being turned out with head-collars as contained in Recommended Best Practice (g) must be elevated to Minimum Standard No 4.</p>	
	7	<p><b>RBP (b) and (e)</b> Should be MS</p> <p><b>RBP (f)</b> Equipment should never rub at any time!</p>	<p><b>Disagree</b></p> <p><b>Covered in MS in this section</b></p>
	8	<p><b>RBP (e)</b> add “and should be introduced to the horse in gradual stages, with the horse untied”.</p>	<p><b>Disagree</b></p>
	7	<p><b>General information</b> “<b>they need to be checked frequently to ensure that they not become</b>” should say do not</p> <p>“... or the halter is not chaffing or restricting..” should say halter or headcollar</p> <p>“<b>positive enforcement</b>” should say positive reinforcement</p> <p>“<b>There is a now a wealth of knowledge</b>” remove superfluous a</p> <p>“<b>positive methods are used where possible or advice sought</b>” replace or with and</p>	<p><b>Text deleted</b></p> <p><b>Text deleted</b></p> <p><b>Text deleted</b></p> <p><b>Text deleted</b></p> <p><b>Text deleted</b></p>
	8	<p>“<b>the use of restrictive equipment</b>” will again cause confusion as to appropriate training methods. It may be necessary to expand on correct terminology around learning theory (positive and negative reinforcement, habituation, and clarity on what a “punishment” is – it’s not negative reinforcement).</p>	<p><b>Text modified</b></p>
3	6	<p>The current drought raises the importance for horse owners to provide sufficient and appropriate feed. Donkeys and mules are more able to withstand drought, but horses and ponies are not able to manage without good supplementary feed.</p>	<p><b>MS that all horses (including ponies and donkeys) must receive appropriate daily feed.</b></p>



9	It is recommended for section 3 the word 'lush' is deleted. Horses can contract laminitis on non-lush pasture. The level of energy available in the grass is the issue in this case.	Agree- removed
7	<b>Introduction</b> Add to the end "Therefore, equines should have access to clean fresh water on demand at all times. Note: Access to water on demand is a basic and essential requirement."	Covered both in the introduction and MS
7	<b>MS 5 (a)</b> After food and nutrients, add "including forage". Note: forage is vital for stomach and gut health and to reduce boredom and the probability of behavioural problems such as crib-biting developing	Disagree – but text included in introduction re: importance of forage
7, 14	<b>MS 5 (d)</b> this minimum standard could and should be more robust and the wording should be altered as follows: <u>"Equines must have continuous access to a reliable supply of drinking water that is palatable, sufficient for their needs; and not harmful to health"</u> .	Disagree – not practical
9, 13	<b>MS 5 (c)</b> BCS 5 is too late to intervene for obesity and we suggest the following wording which brings it into line with the standard on emaciation:  'If any equine shows signs of being very fat or if the body condition score of any equine exceeds 4 (on a scale of 0-5) urgent remedial action must be taken to decrease body weight.'	Disagree – but MS modified to reflect this
7	<b>Example indicator 5</b> 'feed' should say 'grass'  <b>Example indicator 7</b> I would say horses should be provided with fresh clean water on demand. This is a basic, minimum requirement.  <b>Last example indicator</b> 'needs' should say demands	Disagree  Disagree  Disagree
8	<b>Example indicator 6</b> after "separate piles", add "and including one or more extra piles or feeding individual horses in separate areas".	Disagree
16	<b>Example indicators</b> Points 8 and 9 (page 14) state that " <i>Water quality is monitored ...</i> " and " <i>water reticulation systems are monitored...</i> ". Neither instance is applicable to a situation where a farmers is working in the hill country	Disagree

7	<p><b>RBP (a), (c), (h), (i), and (k)</b> should be MS's.</p> <p>In regards to (a): I believe fasting before races is practiced in the racing industry, but there is published peer reviewed evidence this leads to poor welfare by contributing to erosion and ulceration of gastric mucosa (Murray and Eichorn (1996), American Journal of Veterinary Research, 57(11), 1599-1603). Horses should have access to water on demand.</p> <p><b>RBP (e)</b> Reduced by how much?</p>	<p><b>Disagree</b></p> <p><b>Not feasible to insert prescriptive value here</b></p>
13	<p><b>RBP (a)</b> says not to be deprived of water for longer than 12 hours. The transport welfare code says 6 hours for monogastrics (pg23 in example of indicators for minimum standard No 10). Suggest equine code correlate with transport code.</p>	<p><b>Text removed</b></p>
8, 14, 7	<p><b>RBP (a)</b> With the exception of being under veterinary treatment, there can be no reason for any equine to be deprived of food and/or water for any period greater than 12 hours. It would not be acceptable for a mare in late pregnancy or early lactation to be deprived of food or water for any period greater than 3 hours, except on the explicit instructions of a treating veterinarian.</p> <p>Recommended Best Practice (a) should be elevated to Minimum Standard No 5.</p>	<p><b>Text removed</b></p> <p><b>Text removed</b></p>
10	<p><b>RBP (i)</b> Relocate to MS 3?</p>	<p><b>Disagree</b></p>
9	<p><b>RBP (f)</b> the NZEHA advocates this be deleted and 'pregnant' added into (g).</p>	<p><b>Agree</b></p>
7	<p><b>General information</b> end of first paragraph, add "and this will also reduce exposure to parasite eggs and larvae."</p> <p><b>Paragraph 2.</b> "Donkeys, mules and smaller ponies have a tendency generally require" Add "to".</p> <p>Rest of paragraph: They require more roughage than horses? Is there evidence for this? Surely larger horses need more roughage overall (considering bodyweight) than smaller ponies? Needs clarification. Right regarding requirement for lower protein</p>	<p><b>Disagree</b></p> <p><b>Disagree – but text modified</b></p> <p><b>Text modified</b></p>

		<b>Paragraph 3. “Sufficient safe forage needs to be provided for equines”</b> Add ‘for good stomach and gut health’ <b>Last paragraph in general information</b> Water should always be available on demand.	<b>Disagree</b> <b>Disagree</b>
	<b>13</b>	<b>General information</b> Second to last paragraph this has been taken from the Code of Recommendations and Minimum Standards for the Welfare of Horses except have removed the recommendation of 1 horse per hectare in winter. Why is this? Giving an example like this can be very helpful for explaining to people what an animal requires.	<b>Prescriptive measures are avoided where possible and standard written as outcome based.</b>
<b>4</b>	<b>7</b>	<b>Introduction</b> Last paragraph, after “Insufficient exercise”, please add ‘and/or long periods of stabling’	<b>Disagree – long periods of stabling is providing insufficient exercise.</b>
	<b>7, 9</b>	<b>Example indicators</b> Title should say “6”. Example indicators in section 3 should say “5”.	<b>Disagree</b>
	<b>7</b>	<b>RBP (b)</b> Where? Are they returned to the paddock after removal?	<b>Text added to clarify</b>
	<b>9</b>	<b>RBP (c)</b> rather than stating horses should be kept in herds, it would be more practical to state that horses should have company.	<b>Text modified to reflect this</b>
	<b>7</b>	<b>General information, final paragraph</b> After “maintain its health”, add “and welfare”.	<b>Agree</b>
	<b>9</b>	<b>General information</b> NAWAC discusses the use of jack donkeys being kept to reduce aggression and fighting between bulls. This is often counter to providing for a donkey’s welfare as the level of nutrition available to fast growing bull beef herds is far in excess to that required for donkeys and laminitis is a well known sequelae. Deletion of this reference is recommended.	<b>Agree – text removed</b>
	<b>13</b>	In General Information or Recommended Best Practice add that it is advisable to keep a minimum of two donkeys. Donkeys prefer another donkey as company more so than a horse/pony needing another horse/pony even though they can all be kept with other animals.	<b>Disagree</b>
<b>5.1</b>	<b>6</b>	An important fact that should be noted in the code is that it is essential that donkeys have dry shelter or cover in wet weather. Donkeys do not have waterproof coats and the rain will chill them to the skin quickly. Donkeys can easily	<b>Agree. A sentence to this effect has been added in</b>

		die of pneumonia especially foals.	the GI in section 4.1
	9	<b>MS 7 (a)</b> states that horses must have access to shelter without recognising that covers are an alternative. The NZEHA recommends that this standard be amended to state that ‘all equines must have a means to reduce the risk to their health and welfare caused by exposure...’	<b>Disagree. Covers are categorised as shelter for the purpose of this code.</b>
	16	<b>MS 7 (d)</b> Again, this Minimum Standard in general appears to not take account of the realities of working farm horses, for example (page 18) “(d) <i>Where equines develop health problems associated with exposure ... priority must be given to remedial action that will minimise the consequences of such exposure</i> ”. To make allowance for such farming situations – where work (often animal welfare driven) has to be done in adverse weather conditions, this requirement should be rewritten as “ <i>Where equines develop health problems associated with exposure ... priority must be given to remedial action that will minimise the consequences of such exposure to the extent practical in the circumstances</i> ”	<b>Disagree</b>
	10	<b>Example indicators</b> “Horses” should read “equines (more particularly, horses)”?	<b>Disagree</b>
	13	<b>Example indicators</b> One relating to shelter would be appropriate.	<b>Els regarding shelter have been added</b>
	7	<b>RBP (c)</b> should say “should be inspected daily to ensure that they fit the equine correctly and are not rubbing on the skin”.	<b>Disagree</b>
	8	<b>RBP (b)</b> consideration should be given to a clip that leaves hair over the back, for added protection. For example, the trace clip still allows cooling out of a horse appropriately, but also provides more reasonable protection to the paddock-kept horse in winter.	<b>Noted – but disagree that the different types of clip need to be covered in the code</b>
	8	<b>General information</b> There needs to be something mentioned here about the over-rugging of horses in summer. Frequently horses are in too hot rugs in summer, either in the paddock, without shade or shelter or standing ties to trucks in the sun at shows. Light summer rugs must be used.	<b>An RBP has been added that the correct weight of rug should be provided dependant on the weather</b>
5.2	7	Where it says “temporary housing” it should say “short-term housing”.	<b>Text changed here</b>

	7	<b>Example indicator 6</b> “All stable and barn doorways are wide enough for an equine...” Add “and handler”  [also applies to example indicator in Housing]	Agree - added
	7	<b>RBP (a)</b> should be MS surely!	Moved to be an EI for the MS
5.3	7	<b>Introduction</b> “A loose box will provide each equine with sufficient room to lie down, rise and turn around in comfort.” Should say “must provide”.  Add “To minimise the negative impact of confinement and isolation on the welfare of stabled horses they must be given the opportunity to run freely in a paddock as frequently as possible and for as long as possible, in the company of other horses. This will help prevent the development of stereotypies such as box walking and crib-biting and other behaviour problems.”  “ <b>Most stalls are used for temporary housing and are not ideal for ongoing or long-term use,</b> ” Should say “not ideal”.	Disagree  Disagree – but information and an RBP is included in section 7 to say that horses should be able to graze daily and have free exercise
	13	<b>Introduction</b> It is recommended that stalls are used for periods not longer than 12 hours but the Minimum Standard allows for 15 hours. Why has the time been so greatly extended from the Code of Recommendations and Minimum Standards for the Welfare of Horses which said 6 hours section 4.3 pg15 under minimum standards for stalls? We suggest 12-15 hours tied in a stall is too long. We suggest that for periods exceeding 6 hours, horses should be housed in a loosebox, unless there are specific veterinary reasons.	MS changed to allow a maximum of 6 hours tethered in stalls, unless under veterinary recommendation
	16	<b>MS</b> While the requirements are prefaced by the phrase (a) “ <i>When housed</i> ” – adequately when horses are not housed indoors – the stated [(a) – (i)] requirements do not address the situation where a working farm horse is temporarily housed while working (eg in the high country) on trips lasting more than a day. To cover this situation, this standard should be reworded as “ <i>When not working and when housed ...</i> ”	Disagree
	7	<b>MS</b> Add as a minimum standard- there is plenty of science to support this: Horses must be given the opportunity to run freely in a paddock as frequently as possible and for as long as possible, in the company of other horses.	This is included as an RBP in section 5

		<b>MS 9 (f)</b> no risk surely!	
	7, 8	<b>MS 9 (c)</b> Where does this figure come from? Seems high!  I consider this to be far too long, and the hours should be reduced.	<b>Text modified here</b>
	10	<b>Example indicators</b> Include here, as well as under RBPs and General information: “Appropriate fire prevention measures and an emergency plan is implemented”. This goes a long way to ensure the safety of equines, not just people.	<b>EI addressing contingency plans has been added as an EI</b>
	7	<b>RBP (d), (f), (g) (h) and (i)</b> should be MS’s	<b>Disagree</b>
	8	<b>RBP (e)</b> Only “English” style halters should be used for cross-tying – never rope halters.	<b>Disagree</b>
	9	<b>RBP (e)</b> the NZEHA recommends the cross ties in stalls should be of a length that allows the horse to drop its head to at least the level of its knees. This is a good normal head position for horses that allows the airways to clear contaminants.	<b>Agree – information added to RBP to reflect that.</b>
	7	<b>General Information “Contingency plans for potential fire, flood and restriction of supplies are essential in a large stabling environment.”</b> Should say <b>any</b> equine environment, and add “as is planning for a disaster situation, such as wildfire, earthquake, storm or other natural disaster.”	<b>Agree – text changed</b>
	8	<b>General Information</b> It would be helpful to add that bedding is best piled a little higher at the walls to prevent injury and lessen the likelihood of horses becoming “cast” and unable to get up.	<b>Agree – text added</b>
6.1	7, 13	<b>MS 10 (c) “discretly”</b> Incorrect spelling. Should be discreetly	<b>Agree – text changed</b>
	16	<b>MS 10 (d)</b> This standard states “(d) <i>If a mare is exhibiting any signs ... that she is experiencing difficulties ... following foaling expert assistance must be sought</i> ”. To allow for circumstances where a farmer or other animal owner in a remote area cannot obtain (even by telephone) the required “ <i>expert assistance</i> ” in a timely manner, this statement should be reworded as “ <i>If a mare is exhibiting any signs ... that she is experiencing difficulties ...</i> ”	<b>Disagree</b>

		<i>following foaling appropriate attempts must be made to obtain expert assistance”.</i>	
	<b>14</b>	<b>Example indicator</b> “Sufficient bedding, warmth, shelter, food and water are provided for a mare due to foal”, should be re-worded in such a manner that the climatic differences between the northern part of the North Island and the southern portion of the South Island are clearly recognised.  SPCA agrees that this example indicator needs to be included, but contends that the wording is not appropriate in its current form.	<b>Text removed</b>
	<b>7</b>	<b>General Information</b> Worth noting that difficulty in foaling is a veterinary emergency and that mares can die as quickly as 30 minutes after getting into difficulties. If vets are not on hand during foaling it is vital to access veterinary assistance within 30 minutes to have a chance of saving the mare and foal.	<b>Text added to this effect</b>
<b>6.2</b>	<b>7</b>	<b>Introduction</b> Add to the last sentence “if the process is properly managed.”	<b>Agree – text added</b>
	<b>12</b>	<b>MS 11</b> Add (c) where foals are unable to be reared with their natural mother alternative equine company must be provided	<b>Disagree</b>
	<b>13</b>	Regarding weaning age: Rogers, Gee & Firth (2007) survey of TB studs in NZ showed that foals are weaned at average 5months, range from 3.7 – 7 months. This is at odds with the RBP of 6 months. What is this based on?	<b>Text changes to be outcome based</b>
	<b>9</b>	<b>RBP (b)</b> This is another example where age is an arbitrary guideline and it is not age but impact on health and welfare of both the mare and foal which should guide best practice. Some research on this has shown no difference on these parameters between foals weaned at 4 months compared to foals weaned at 6 months. 11 (b) might be better deleted in preference to the other points given.  With regard to times foals receive and absorb colostrum the NZEHA notes the current proposed wording is misleading. The ability to absorb colostrum reduces with age so it is more appropriate to indicate this by stating ‘there is much reduced absorption at 24 – 36 hours after birth.’	<b>Text changed to outcome based?</b>  <b>Disagree</b>
	<b>10</b>	<b>RBP (b)</b> “Equines” should read “foals” – unless ponies, donkeys and cross-breeds can be weaned at different ages?	<b>Disagree</b>
	<b>7</b>	<b>General Information, paragraph 2:</b> Add “The former is highly stressful for mare and foal and may have long term	<b>Disagree</b>

		<p>negative consequences for health, behaviour and welfare, particularly of foals, and is no longer considered good practice.”</p> <p>Should also mention the nanny system, where several mares and foals are kept together in a large paddock, and mares removed one by one over several days, their foals remaining behind, until all the foals are weaned. Thought to be better for foal welfare as foals have social support of other foals and mares.</p>	<b>Disagree</b>
<b>6.3</b>	<b>7</b>	<b>MS 12 (a)</b> I cannot see under what conditions laparoscopic A.I. is ever appropriate or necessary considering the availability of cervical A.I. Its use appears outdated, unnecessary and unethical now. It should not be used.	<b>Disagree. MS included in the code in case it is used.</b>
	<b>10</b>	The NAWAC recommendation should be supported because surgical embryo transfer requires competent application – transfer can cause significant pain and suffering if done incorrectly. Skill, qualifications and expertise is required.	<b>Agree</b>
	<b>7</b>	<b>RBP (a)</b> This latter part of this (breed) needs to be made clearer. Doesn't really follow or make sense at the moment.	<b>Text removed</b>
<b>6.4</b>	<b>8</b>	Agree that tooth extraction be either a significant surgical procedure, or a controlled surgical procedure (trained, professional horse dentists, with veterinarian assistance for pain relief and sedation if necessary).	<b>Noted</b>
	<b>13</b>	<p>This section is a bit light. We would like to see more information added about other surgical procedures carried out on horses. In its submission on the Animal Welfare Act review (please refer), NZVA made the following recommendations about the classification of surgical procedures in horses:</p> <p>Tail docking of horses – should be prohibited except for medical reasons</p> <p>Desexing of horses (and other equids) – should be a significant surgical procedure</p> <p>Caslick's procedure – should be a significant surgical procedure</p> <p>Rectal examination in horses - should be a significant surgical procedure</p> <p>We note that NAWAC is recommending tooth extraction should be a significant surgical procedure which NZVA</p>	<b>Disagree – not for inclusion in the code</b>



		<p>would endorse.</p> <p>In its submission on the Animal Welfare Act review NZVA requested that the following procedures be classed as significant:</p> <p>Tooth extraction in horses</p> <p>Endodontics in horses</p> <p>In addition, the NZVA requested that the following procedure be listed as prohibited:</p> <p>The use of “cut off” wheels for reduction of incisors in horses</p> <p>In addition we have attached a commentary from the NZEVA regarding the castration of horses.</p>	
	10	<p>With the aim of clear understanding, should the terms ‘biting, firing or nicking’ be explained simply here? “I didn’t know” is no defence in law.</p>	<b>Disagree – not appropriate to define here</b>
	10	<p>The NAWAC recommendation should be supported given the state of health can be severely compromised. Although would “appropriately qualified person” (or similar) be adequate, allowing tooth extraction to be done without having the expense of a vet as breaching a point of law?</p>	<b>Disagree</b>
6.5	6	<p><b>Identification</b> We would like to see microchipping for permanent identification encouraged for donkeys and mules. This is to better follow their breeding and because freeze branding does not show on donkeys as their coat does not lend itself to it. If the freeze brand is held long enough to kill the hair then it is an inhumane way to identify them as it takes a long time to heal.</p>	<b>The use of a microchip is an option for identification.</b>
	13	<p><b>Identification and call for comments</b> The NZEVA recommends that best practice should include multi-modal analgesia for both fire and freeze branding. There are studies in cattle showing aversion to freeze-branding (although less aversive than hot-branding) e.g. Schwartzkopf &amp; Genswein 1997 (attached). There does seem to be a paucity of research in equines, and there needs to be research into the effects of freeze-branding, which should ideally make some attempt to assess pain following branding. We need to know whether phenylbutazone makes a difference, or whether the use of alpha-2s plus butorphanol at the time of branding is sufficient vs. commonly using no analgesia or sedation in standardbreds. Until this research is done, the NZEVA believes that the minimum</p>	<b>Disagree. But RBPs included around reducing pain during freeze branding</b>

	<p>standard must assume that all types of branding are painful procedures, and therefore analgesia must be provided for all types of branding.</p> <p>(i) The NZEVA also support having a preferred order of identification method listed under Best Practice i.e. microchipping then freeze branding (with liquid nitrogen), then hot branding.</p> <p>(ii) Should we be encouraging phasing out of fire branding (now banned in Scotland and Denmark)? Ultimately freeze-branding too???</p> <p>(iii) There is some scientific evidence that microchipping is less aversive than hot branding in horses.</p> <p>(iv) There doesn't seem to be any research on freeze vs. hot in horses, but freeze seems less aversive than hot in dairy cows.</p> <p>(v) The NZEVA believes that the preferential use of microchips over branding should be stated as best practice, to guide the equine industry in the future with regard to any decisions that they may make regarding horse identification.</p>	<p><b>Disagree</b></p> <p><b>Disagree. Not in the code.</b></p> <p><b>Noted</b></p> <p><b>Noted and agreed</b></p> <p><b>Disagree</b></p>
7	<p><b>Call for comments</b> I am the author of a scientific report commissioned by the UK RSPCA on id methods in equines. I investigated hot branding as part of this, and concluded hot branding causes significant pain and suffering and the practice should end. My conclusions were based on peer reviewed scientific literature and field studies. Regarding pain relief (and in <b>RBP (c)</b>), this would have to be applied for several days after branding, as the pain is likely to last for several days.</p>	<p><b>Noted. Hot branding cannot be banned in the code</b></p>
9	<p><b>Call for comments</b> The NZEHA advises that using liquid nitrogen is preferable to dry ice as a best practice because it decreases by at least 50% the time the brand is required to be applied to permanently affect the follicles of the horse's coat.</p> <p>It is the view of the NZEHA and experts the NZEHA consulted that local analgesia for branding is impractical and currently veterinarians favour opiate based medications for thoroughbred branding where brands are applied to both sides of the animal. These medications are only able to be administered by vets. Currently standard breeds receive a single freezebrand to the neck and usually do not receive any pain relief. The requirement to employ a veterinarian may increase the cost.</p>	<p><b>This information is in the RBP</b></p> <p><b>Disagree.</b></p>

		NSAID's are able to be given orally by owners, thus other options may be open. Some research would help in developing best practice guidelines for the management of pain associated with branding. The NZEHA advises that the recommendations as currently worded are intuitive as opposed to being based on scientific research. Once the pain associated with different types of branding is better understood then any recommendations on pain relief can be amended, if required, in line with the NAWAC painful husbandry procedures code.	<b>Noted</b>
	10	<b>Call for comments</b> all pain relief should be strongly supported, therefore the code might include suggested types of pain relief e.g. cooled uncontaminated saline water (for hot branding).	<b>Disagree</b>
	10	<b>RBP (a)</b> Include type of pain relief (e.g. saline water) + recommended temperatures for branding and pain widely used here on the East Coast.	<b>Disagree</b>
6.6	7	<b>MS 14 (a)</b> Unreasonable or unnecessary are vague terms. How much pain and distress is unreasonable? It would be good to be much more specific.	<b>Disagree – this is as stated in the Act</b>
	12	<b>MS 14</b> add an additional clause (d) Equines must be offered water and food at least every 5 hours during transport	<b>Disagree</b>
	14	<b>MS 14 (b)</b> SPCA submit that the following words must be added to Minimum standard No 14, (b). "If there is any doubt as to an equine being fit for transport, a veterinary certificate must be obtained."	<b>Disagree</b>
	7	<b>Example indicators</b> What about access to water and food? What about maximum journey times?  Foals under 4 months of age: I would say this should be 6 months of age.	<b>Disagree</b>
	8	<b>General information</b> Mention should be made here regarding ensuring that the vehicle must be legal to tow a laden float of that weight, and has a correctly attached, certified tow-bar. Many vehicles towing horse floats are not suitable heavy for the job, or are over-laden, meaning they are a hazard to themselves and other road users.	<b>Disagree</b>
7	5	<b>MS</b> should include that "alternative therapies" such as homeopathy, herbalism and other clinically dubious quackery are not considered suitable treatment for equines and should not, in any circumstances, be a replacement for conventional medical treatment.	<b>Information has been added to the introduction to reflect this</b>

	16	<b>MS</b> Part (a) requires (page 29) that “ <i>Those responsible for the welfare of equines must be competent at recognising ill health ... and take prompt remedial action as appropriate</i> ”. In the context as written (eg “as appropriate”), the word „prompt” is superfluous and should be removed.	<b>Disagree</b>
	9, 13	<b>Example indicators</b> head-shaking should be removed as an example of possible injury or disease due to the complex aetiology of the condition.	<b>Agree</b>
	13	<b>Example indicators</b> Indicators of dental health: “feed-packing in cheeks” should be added to the list	<b>Agree</b>
	14	<b>Example indicators</b> 4 <sup>th</sup> bullet point reads: Animals that fails to respond to treatment are humanely and promptly destroyed. This example indicator must be moved into the Minimum standard.	<b>Disagree</b>
	7	<b>Example indicators</b> Add “and which are in a state of poor welfare as a result” after “Animals that have failed to respond to treatment”.  Add “which” here: Expert advice and treatment is sought for any irregularities in the hoof which are causing the equine to be lame or <b>which</b> may cause potential problems if not remedied [2 <sup>nd</sup> last indicator]	<b>Text removed</b>
	7	<b>General information, end of 4<sup>th</sup> paragraph</b> Instead of “muscular problems and impaired movement which can possibly result in irreparable damage” it should say “...which result in suffering and possibly irreparable damage”.	<b>Disagree</b>
	9	<b>General information</b> The ill health effects of equines standing in wet conditions also include skin conditions of the lower limb. To that end the NZEHA suggests the addition of a further sentence relating to the desirability of enhancing the drainage in wet paddocks or removing equines out of boggy paddocks, or providing a dryer standing area.  In the general information section relating to the sharp outer edges of teeth, the NZEHA would like to point out that the inner edge of the lower pre molars and molars can also develop sharp points so it may be easier to remove the word ‘outer.’	<b>Disagree – information already included about horses standing in excess moisture</b>  <b>Agree - removed</b>
8	13	<b>Introduction</b> The first para in Introduction includes some “must” statements that should be minimum standards.	<b>Text modified</b>

	13	<b>MS 16</b> NZEVA believes that the following be added as a minimum standard: 'Captive bolt as a sole method does not constitute humane euthanasia.'	<b>Disagree</b>
	7	<b>RBP (a)</b> should be MS	<b>Disagree</b>
	13	<b>RBP (b)</b> should be 'discreetly'.	<b>Agree - changed</b>
	10	Recommend consistency with the terminology: killed, humane destruction, destroy, emergency slaughter, effective slaughter + euthanasia – all mean ending a life, however isn't the purpose of the Code to be clear, and to promote ethical and humane action to reduce or remove pain and suffering?  See also Appendix IV (c) (v) and Section 12c [for issues with consistency of terminology].  Terminology should be included in Appendix III: Interpretation and definitions.	<b>Noted</b>  <b>Noted</b>  <b>Disagree</b>
	9	Those practitioners experienced in using firearms to euthanase horses stated <b>RBP (a)</b> should be removed.	<b>Disagree – unsure what this is referring to</b>
	10	<b>RBP (a)</b> should include ideal spot on the head for ultimate effectiveness, not just under general information.	<b>Disagree</b>
	9	It is the NZEHA's view that captive bolts often do not penetrate deep enough into the horse's brain to cause death so the preference of the NZEHA is that guidance be given that captive bolt must not be relied upon as a sole means of euthanasia.	<b>Agree – MS to state that animal must be bled out immediately after stunning.</b>
	9	<b>MS</b> the NZEHA recommends it is appropriate that, following humane destruction, death be verified by monitoring for the absence of a pulse and absence of eye reflexes, and that this should be included in the minimum standard. The example indicator should describe the competence of the person undertaking the emergency humane destruction as 'including an understanding of the anatomy of the head and location of a horse's brain.'	<b>Disagree</b>
<b>Appendix I</b>	4	Obtain better diagrams to illustrate the various body condition scores. Those in the draft are inadequate.	<b>Disagree</b>
<b>Appendix</b>	10	The Appendix II diagram is confusing.	<b>Disagree</b>

II		Terminology: some people might be confused with the term “stunning” as opposed to any euthanizing practice. If “stunning” equals “killing”, add “to euthanase” the optimum position... otherwise, differentiate between the practices.	
Appendix III	13	p. 37 ‘Dystocia’ does not appear in the text P39. ‘Teaser’ does not appear in the text.	Agree Agree
Appendix IV	16	Sentence three in paragraph one (page 40) states – in what I assume is a typographical error - “ <i>However this code ... and owners and those in charge of goats</i> (emphasis added) ...”	Agree – text changed!

**Plus – not a formal submission – but for consideration...**

Had read through the draft code and wondered about the destruction of an equine when it wasn’t an “emergency” situation.

Does the code cover the destruction of a horse in a non emergency situation such as:

- it is badly behaved
- owner can’t afford to keep it
- more useful as dog tucker or for human consumption
- old and tired and useless
- owner doesn’t want it?

None of the above is commercial slaughter nor is it for “emergency humane reasons”. Should it be killed any differently?

Wondered if clarification was required.

Realise this draft code is past the date for submissions so no need to include it as a formal submission.

Regards



## Submission Questions

	QUESTIONS
1	Do you consider a code of welfare for equines to be necessary? Are there any alternatives which would achieve the same outcome as having a code of welfare? If so what are they?
2	Do you agree that the minimum standards in this code are the minimum necessary to ensure that the physical, health, and behavioural needs of equines will be met? For example, do the minimum standards reflect good practice (not just current practice), current scientific knowledge and available technology? If not, what alternatives do you suggest? Please state your reasons.
3	Do you agree the example indicators given are appropriate to describe how to measure or assess the achievement of the intended outcome of the minimum standards? If not, what alternative(s) do you suggest? Please state your reasons.
4	Do you agree that the recommendations for best practice in this code are appropriate? If not, what alternatives do you suggest? Please state your reasons.
5	Do you think this code would change existing arrangements for the management of equines? If so, how, and to what extent?
6	Will complying with this code involve costs for you or your business? For example, costs may include converting existing animal facilities or employing new staff.
7	What barriers do you see to the implementation of the proposed code and how might they be resolved?
8	What benefits do you see from having this code? Benefits may include, for example, increased certainty about animal welfare requirements or market gains.
9	What other impacts would this code have on New Zealand society, the economy, or the environment?

Q.	No.	Comment	NAWAC Response
1	3, 7, 8, 9, 12	Yes, we consider a code of welfare for equines to be necessary.	
2	3	The minimum standards in this code are sufficient in that our concerns for donkeys and mules are covered.	
	7	In a number of cases we have identified on the draft code document, practices identified as RBPs appear to actually be MS's necessary to ensure that the physical, health and behavioural needs of equines will be met.	
	9, 12	This draft version of the code sets appropriate minimum standards. We have made some further minor suggestions.	
3	3	We believe that the example indicators are appropriate.	
	7, 9	In general, we do agree, but please note where we have made suggestions for alternatives on the draft code document.	
4	3	Recommendations are appropriate.	
	7	In general, we do agree, but please note where we have made suggestions for alternatives on the draft code document.	
	9	The NZEHA notes that it is difficult to draw the line between what to add in general information so that critical information can assist owners in fulfilling their obligations, and becoming over prescriptive. The NZEHA supports any further editing to minimise the general information sections in reference to readers having clearer and better researched information from such sources as the NZ Equine Research Foundation books.	
5	3, 12	The code will provide a basis for change IF the various equine organisations use it as a training/education tool.	



	7	In some cases some relatively minor changes of management may be required, but what is suggested is already widely regarded as good practice. The benefits in terms of both animal welfare and health and performance of equines merit the management changes required.	
	8	The code would require changes for the worst operators. The main perpetrators will likely not educate themselves about the standard; it is imperative there is education throughout the equine sector.	
	9	This code, as drafted, would require some changes to some established practices for some sectors and we have indicated to them that they should identify these to you directly. As an example, when hot branding, pain relief must be offered. It may be that not all horses are given pain relief currently however we agreed that there was sufficient evidence to support that pain relief should be used when hot branding.	
6	3	This will depend on how we use the code. A number of donkey and mule owners would not currently be complying with the code, at least not with the recommended best practice! Our organisation exists to try to bring donkey and mule owners up to the standards outlined in the code so there should be no increase in our costs beyond what we should be doing already.	
	8	There would be no costs for me personally, as I have left the equine industry, although I still maintain an interest in equine welfare.	
	9	The NZEHA has not identified any substantial costs that would impact on the ability of horse owners to continue their various activities but if this is the case we have indicated to member organizations that they should identify any costs that may arise in their sector directly.	
	12	No, as our facilities and management already comply with the code	
7	3	Only the time and effort to get equine owners to understand and meet the terms of the code.	
	7	There may be some resistance in areas of the equine industry required to change practices, but clear communication of the benefits along with effective enforcement of the code should be effective in achieving change. It is importance that it is explained that the proposed code is based around widely accepted good practice.	
	8	The barriers are education about the standards, and lack of officers to check standards are being met. I would like to see equine specific welfare officers at equine sports meetings.	

	<b>9</b>	For some in the equine sector, compliance will require a change in their existing knowledge and practices. This in turn may require a mix of education and skill enhancement.	
	<b>12</b>	The initial barrier is to enable all equine owners in NZ to access and understand the code and how it applies to them. I imagine that if complying with the code involves financial outlay, then this may be a barrier to individuals implementing the code.	
<b>8</b>	<b>3</b>	Having a national code to refer owners to could be a considerable benefit if used carefully and constructively.	
	<b>7</b>	The welfare of equines should be enhanced through the adoption of this code. Furthermore, animals with better welfare will perform better. Some of the proposed good practice should have the effect of reducing the performance of dangerous and aggressive behaviour by horses, resulting in less human injury and loss of earnings.	
	<b>8</b>	Benefits of the code centre around having specific, measurable outcomes, which helps clarify what is an “offence” and gives increased opportunity to make any prosecutions necessary	
	<b>9</b>	The NZEHA believes that the code signals that the NZ public and equine industry takes horse welfare seriously.	
	<b>12</b>	Quite simply, the knowledge that all equines in NZ are receiving good care and are able to live in closer alignment with their nature.	
<b>9</b>	<b>3</b>	The definition of “ownership” at the beginning pins the duty of care to anyone who has “control” of an equine, even if they say they are only looking after it for someone else. That is a significant advantage!	
	<b>7</b>	Establishing codes of welfare is a means of achieving positive animal welfare. A society which treats its animals well gains international respect and standing.	
	<b>8</b>	Impacts on New Zealand society would mean a clearer message as to appropriate treatment of animals. There is a well-known correlation between ill-treatment on animals and domestic violence and other violent acts, therefore, a less tolerant society for animal abuse, be it through ‘ignorance’ or deliberate cruelty, improvement on the treatment of horses may have a positive impact on the health of society in the treatment of children, women and the elderly and infirm.	