

## Animal Welfare (Pigs) Code of Welfare.

### Summary of Submissions from Public Consultation

#### General comments

Sub No.	Comment	NAWAC Response
1	I am appalled by this lack of urgency in the new "Welfare" code for pigs. What are the reasons for the delay? Why must we wait another 7 long years for any action to take place?	Noted
3	We recognise the economic arguments that farmers may make as reason for keeping sow stalls and farrowing crates. However, we feel that there are greater issues to be considered. These animals are clearly subject to the decisions we make - we feel that if we are to raise animals for human consumption then it should be done in a natural and ethical way that minimises the stress and cruelty imposed on the animals. There is no real need for either of these methods to continue to be used and we urge NAWAC to take action such that farmers are required to raise livestock in an ethical, moral, natural way.	Noted
4	There is no humane or persuasive economic reason to protect those farmers who do not comply with the Animal Welfare Act and continue to implement cruel and inhumane practices. These farmers should be exposed to public attention and prosecuted, rather than being protected by government and post-dated provisions in the Draft Code.	Noted
6	The current review of the Animal Welfare Act goes nowhere near treating pigs ethically and humanely. Pigs are intelligent sensitive creatures that deserve humane shelter, bedding material and diversity in food type.	Noted
8	Many people in New Zealand are appalled to say the very least at pigs being 'farmed' in stalls! It is downright cruel and motivated by greed and must end sooner than later - the sooner the better.	Noted
10	I would like to take this opportunity to communicate concerns surrounding the Draft Welfare Code for Pigs, both in respect to the content contained within the draft and the proposed timing of changes. In particular I would like to add my voice to the growing public dissatisfaction with the use of dry sow stalls and farrowing crates as means of confinement for pigs.	Noted
11	NAWAC's plan to ban sow crates is commendable, and reflects a growing scientific consensus that sow crates do not meet basic animal welfare standards. However, NAWAC's current draft code contains a criteria that appears legally inconsistent with the Animal Welfare Act. The Act states that codes may only allow close confinement systems when they confer demonstrable animal welfare benefits relative to other management systems. Yet this draft code imposes the additional criteria for banning gestation and farrowing crates that alternative systems must "deliver better welfare outcomes overall at a practical and economic cost which allows New Zealand producers to remain competitive with producers of imported product." This criteria appears to violate the act by imposing a non-	Noted

	<p>welfare related test for deciding whether to ban a close confinement system. It implies that if no demonstrable animal welfare benefits existed to justify the use of gestation or farrowing crates (as I believe they do not), allowing these crates could be justified merely on the basis that New Zealand pork producers need them to stay competitive with foreign pork producers, some of whom will undoubtedly continue to use the crates into the future. While NAWAC clearly has a general mandate to balance animal welfare and economic factors, it is not clear that the AWA extends this mandate to the issue of close confinement systems. On such systems, it seems that the mandate is quite simply to maximize animal welfare. Hence, this draft code, by imposing an additional burden for banning a close confinement system, appears to be in breach of the Act. The urgency of this issue is that the draft code would allow pigs to suffer significantly for no clear welfare benefits. Given that breeding sows can be impregnated up to 2.5 times per year, the proposed regulations would allow the sow to be confined for up to 20 weeks per year - or 200 weeks over a typical 10 year sow lifespan. This means a cumulative 4 years of extreme confinement per breeding sow. Such confinement can not be justified in the interests of the sow's well being. I urge you to amend the draft code accordingly.</p>	
12	<p>I consider a code of welfare as absolutely necessary for pigs. The reason for this is a recognised code of welfare allows those who farm pigs to have a legal document to refer to. This means there would be little excuse for the minority of farmers who show little regard for the welfare of their pigs. While the traditional more freerange method is more costly and can have higher piglet losses, I believe it is what most consumers would prefer. We have an almost subconscious expectation that the NZ pork we buy has come from a nice farm. On top of this a Colmar Brunton poll conducted in 2004 showed 83% of kiwis were morally opposed to factory farmed pigs. While the practise of placing sows in crates is probably better for the pigs welfare, I have seen sows successfully deliver piglets where all have survived. This was done by placing the sow in a shed with hay on the ground. This would again cost the farmer more but I would argue that it would still be possible to make a good profit using this less intensive method.</p>	Noted
13	<p>As there are a good number of farms raising pigs outside in free range conditions I see no reason why all pig farms should not be able to keep their animals in a humane way. If half the piggerys in NZ can do it, so can the others. NAWAC needs to listen to what the people of NZ are saying and put legislation in place to force the Pork Industry Board members to treat the animals with respect and not cruelty, and farm in a way that is not as detrimental to the animals as the conditions they (the ones on farms where sow stalls and farrowing crates are used) are currently forced in live in.</p>	Noted
15	<p>In the '90s I was instrumental in progressing the Animal Welfare Act 1999 into law. I was, and am, strongly supportive of the Act's architecture, in particular its ability to keep abreast of changing practices, technologies and social attitudes in different aspects of animal welfare through the code development process. As a Cabinet Minister (1999-2008) I opposed the then proposed code of welfare for pigs because I thought dry-sow crating had been inadequately dealt with. My opposition delayed process at that time but did not materially alter the outcome. I have read the draft code and accompanying documentation. Perhaps cynically, I am of the view that the draft code as it applies to dry-sow crating has been significantly improved only because of media publicity and perhaps also because of similar changes occurring in Europe. This cynical analysis originates because, unlike many other animal</p>	Noted

	<p>welfare code issues, dry-sow crating has been a long standing feature of some pig meat production but has never been used by other pig meat producers. I acknowledge the impact of climate, especially rainfall, on the choices pig meat producers have but hold, and have long held, the view that the main impediment to change is sunk assets. Producers who have invested in crating systems seek a return over the life of those assets.</p> <p>Research data on animal welfare issues is not available to me, except as a narrative. It may of course not exist, and I haven't sought it on my own account (in recent years at least). But I would be surprised if basic data on, say, indicators of stress were not available. NAWAC may wish to consider a research review document in the future, in the interests of transparency. The economic analysis is accessible. I see no reason why a welfare research analysis could not be written in a manner that is equally accessible.</p> <p>NAWACs processes over the years on this issue have not covered it in glory. The animal welfare implications of prolonged crating are considerable, and in later pregnancy have (in my view) no countervailing animal welfare considerations. Of course I freely acknowledge opposition from some in the industry, and the importance of a widely consultative process. But years and years have been lost. At certain crucial points I believe NAWAC has been less assertive than was appropriate. NAWACs processes over recent months have been more consistent with what I would have hoped for. Accordingly I would like to commend you. No doubt many others, including producers, have contributed but the advisory buck stops with NAWAC and therefore so should the commendation.</p> <p>Strategically I would urge NAWAC to adopt a culture of acting to keep New Zealand 'ahead of the curve' on animal welfare issues. That certainly was the sentiment, from all relevant parties, when I introduced a private members bill that became a precursor to the Act. Whether people began from an animal welfare perspective, or a perspective of reputational risk (at a product level or a country brand level) there was unanimity about the need to raise our game. Such unanimity was always going to be compromised when costs were brought to bear on individual parties. But that doesn't permit NAWAC to lose sight of the wood for the trees. I hope my comments are of some value.</p>	
17	Having read the draft I wish to submit the opinion that the recommendations are half measures. There is no place at all for stalls or crates of any kind - they need to be phased out not compromised. Freedom Farms can do it - so should others. Welfare of the animals is paramount - welfare of big business exploiting animals is secondary. We live in a society that will judged by the way it treats its animals.	Noted
18	I am one New Zealand customer who has voted with their feet on NZ pork, following the TV exposure of commercial pig farm practices in New Zealand. I am purchasing only verified 'free range pork' and would like the government to certify what constitutes an acceptable free range practice standard.	Noted
19	May I make a suggestion - they, I presume there are many on the Pork Board making large dollars who make the decisions to keep pigs in crates all of their lives - have a try at living in a crate just for 1 month and see how it feels. I suppose they think 'its is only pigs" and we get far more dollars doing it this way - do they not think of the literal cruelty of it - that pigs do feel pain and discomfort, they are intelligent creatures given the chance - I do not eat pork of any sort because of this and I know a lot of people who feel the same - I say put them in a crate for awhile - see how it feels !!!!!	Noted
20	After reading the draft Code of Welfare for Pigs it is heartening to read that changes are going to be made eventuating in a complete phase out of sow stalls. It is also good that it is finally recognised that pigs suffer under	Noted

	the present Code of Welfare.	
21	Free range farmers have not complained about pigs fighting and it is not a valid reason for confining the animals. The Pork Industry knows that sow stalls do not fully meet the obligations of the AWA and it must concede to a new Pig Code as written by the NAWAC. Once the new code becomes law it has to be enforced. To date we do not have enough MAF staff to attend to complaints of animal cruelty on farms, let alone to check farms to ensure that they are following the law. I ask Mr Carter to provide more MAF officers.	Noted
24	New Zealand Open Rescue believes the draft Animal Welfare (Pigs) Code of Welfare 2009 dated 3 March 2010 fails to provide for even the most basic necessities of pig welfare. New Zealand Open Rescue has grave concerns in relation to the lack of animal welfare considerations outlined in the Minimum Standards and Recommended Best Practices of the draft. New Zealand Open Rescue seriously questions the integrity of the working groups involved (namely NAWAC and the New Zealand Pork Industry Board) to devise a code for pig welfare given vested economic interests.	Noted
26	Animals should be treated with respect to get the best out of them, what kind of people are we, that we allow such cruelty in our own "Godzone" beautiful country. I simply can't be proud though, with this type of behaviour going on in New Zealand. Humanity as so much to learn from our animal friends, all we can think about is extortion and the dollar sign, it's absolutely appalling. All creatures feel pain, depression and frustration as we humans do.	Noted
28	Apart from supporting the pockets of the local pig farmers is there any reason why your group would not see that the public don't support sow crates? We are living in the 21st century where animal welfare (which I thought you would support - is that the name of your group?) is paramount. We live in a democracy - people power. You heard the outcry when both TV1 & TV3 screened programmes about sow crates. The sales of free range pork went through the roof. Buying locally produced free range bacon products is what we all want. Please stop supporting the producers and start supporting the public. Be democratic or pay the price at the next election.	Noted
30	Now we all have to walk the talk on this regarding pig welfare in all areas of pig rearing in NZ? It is all very well for the public to be emotive about indoor sow operations, wound up by the media, and demand free range (outdoor) pork? but our local District Council, MDC, will not enforce it's own noise control rules (as they want to play politics with the new Fashion Farmers who have moved in to grow a big glut of wine!) 6 years ago a very crude 2 bladed wind frost machine was built beside our farrowing sows with no thought of the racket and impact it has terrorizing our stock? Suckers (piglets) trod on by the mothers or they get lost to perish on a cold night!!! Now the public think sow crates are bad news? We wish we could put our sows in crates away from this nutters theme park on our doorstep. We have been to the SPCA & taken the MDC to the Ombudsmen but no luck as our District council has held things up with waffle fests and have so far bamboozled them all, in the mean time we loose weaner pigs more or less every time they have used this crude machine? Now its all very well to come down like a ton of bricks on the indoor so called factory pig farmer and tell him it is all wrong but under present conditions that prevail maybe that is the only way to go & bulk free range pork will just be a townies myth and a great meat exporting nation like NZ will still import pork from dodgy overseas Factory production pig meat. Anyway unless we (you) sort out these Dysfunctional Councils we are done for in this area of primary pork production make no mistake so, any new animal welfare rules must encompass all the Pig Industry? not only the blokes that use crates & get dragged on national TV	Noted

	on a Sunday night by a one eyed media.	
31	I have serious concerns that the draft Code of Welfare for Pigs does not meet the requirements of the Animal Welfare Act 1999 and consequently does not go far enough to prevent widespread suffering in the pig industry in New Zealand. Sow and farrowing crates are unnecessarily cruel. The UK, Sweden and three US states have already banned them and have working alternatives. Pigs cannot carry out natural behaviours in sow and farrowing crates therefore these confinements are not acceptable under the Animal Welfare Act. Pigs are intelligent, social animals and I am ashamed that in New Zealand we are condoning the horrendous suffering of these animals.	Noted
34	I see no advantage in converting the code of welfare from minimum standards to statements of welfare outcomes, I think this would only lead to confusion over standards and allow less humane farmers to lower their standards in favour of greater profit. It is clear that the New Zealand public doesn't believe that pigs should be keep in cruel conditions, so as NZ Pigs are moved to more humane conditions we should also ban pork products from overseas producers that use inhumane conditions, or for hat matter ban any animal product from inhumane producers.	Noted
35	I am very concerned that the welfare of animals that contribute to our own health and wellbeing, are subjected to cruel and unacceptable practices. The welfare of pigs kept in such unnatural conditions is totally inexcusable and goes against all that New Zealand stands for. The people of New Zealand have stood for human rights against some very considerable odds and we would be going against all the humanity that those "human rights" entail in continuing to sue such deplorable practices like dry sow stalls and farrowing crates and the present factory farming of these intelligent animals. I submit that New Zealand's Animal Welfare Code of Practice for Pigs needs to be radically changed, It needs to actually list what our farm animals would consider was "normal behaviour" for them and then work on how we can integrate that really normal behaviour into our "domestication" process. If an animal lays down its life so they you can live, the least you can do is ensure that life is made as pleasant as possible. Again I ask would you expect your womenfolk to produce your children in such horrendous conditions? Do the right thing and phase out dry sows crates and steel-barred farrowing stalls, if needed give interest free loans to farmers to make the changes. The Government would reap the benefit back by the increase in NZ pork sales and the reduction of imported pork.	Noted
36	Please, may I express my concern about the existing, nasty places in which some pigs are confined in crates and stalls. I would be happier eating healthy food and meat if an animal, who had a stressless healthy life, than from one, who had had a miserable existence. Please, put everything in your power to make pigs' lot more acceptable.	Noted
37	I have been advised that NAWAC is not influenced by the opinion of the general public, and I would point out that he rather obvious outcome for the people involved in subjecting 16,750 ± pigs to a life in stall farms, if all parties to this Code do not acknowledge comments from members of the public. The Animal Welfare Act is a joke! According to the Animal Welfare Act, and the respective Codes for pigs, poultry etc., cruelty is practised all the time, but because it relates to animals used for food, nothing is done about it. These animals are murdered for money, and neither NAWAC or the Pork Industry Council are very likely to do anything to improve the lives of these animals because the only end in sight for them is slaughter. A change in personnel in NAWAC would benefit New Zealand as a whole, and would certainly improve the lives of the animals that are dependent on you.	Noted

38	<p>I only eat free range pork and am horrified that our government bows to the demands of our local farmers so much on issues of animal welfare. Surely it is a sign of a civilized society that we don't abuse those at the bottom of the food chain. I realise that if the costs of local pork farming rise with the banning of sow crates then the market will be open to all sorts of nastier, imported pork. However you must give some credence to the wisdom of the buying public - they want to eat healthy nutritious meat. Surely we should be raising the bar not lowering it. We should be able to aspire to only have a free range pork industry.</p> <p>When Mike King was so very vocal about the horrors of sow crates John Key was interviewed and he promised a thorough investigation of the industry. Is he flip flopping yet again and going back on his word. Please consider not just the animals but the health of the public who eat this inferior meat.</p>	Noted
40	<p>I have very little confidence in the NAWAC because of their specific instructions to take economic issue into account when addressing concerns about animal welfare. The best example of this is Section 73 of the Animal Welfare Act 1999; this allows economic issues to take precedence over the welfare of animals. Most breaches of animal welfare continue under this section of the act. Pig and Hen cages continue despite open acknowledgment that they are unnecessarily cruel, because of section 73 of the act. The frightening aspect of this is that section 73 of the act says that it is only be used under "exceptional circumstances". Unfortunately, it seems that this section is used to defend all institutional acts of cruelty to animals. It is not used under exceptional circumstances. For these reasons I have little, if any, confidence that the NAWAC can adequately protect the welfare of animals.</p> <p>A petition is being circulated by myself and dozens of volunteers throughout New Zealand asking for the use of dry sow stalls to be phased out within 5 years. Public outcry about this issue is huge. I hope the government will do the right thing and ensure the use of cruel practices, such as dry sow stalls, are ended as quickly as possible, for ethical, economic, and election, reasons.</p>	Noted
42	<p>It should not be necessary to point out again the cruelty of keeping highly intelligent animals like pigs in cages. Those who practise this form of abuse demonstrate that they have no knowledge of the needs of animals. Animals need food, shelter, freedom of movement and interaction with other animals. This latter need is particularly true of herd animals, and this includes pigs. Greed for market returns has meant progressively more uncivilised treatment of animals; so much so that now the market is rebelling against a product produced in this way. We have seen how a push for a humane treatment of poultry has brought about a change in that market, and an equally good product. Now we need to see a similar change in the treatment of pigs. It should not be a case of profit above all other considerations. It is a proven fact that happy animals are more productive than those that are stressed. Pigs are stressed by confinement in dirty constricting cages. In their natural state pigs are very clean. They are easier to house train than dogs or cats (fact). They show great ability to interact in a friendly way with humans and make affectionate, intelligent pets. Ask owners of kunkune pigs. Yet we subject them to filthy, unsociable, restricting cages. It is time to change: now, not next year or in some remote future. This is a test of our right to call ourselves civilised. I no longer buy pig meat in any of its many forms and only eat it by mistake in a social setting.</p>	Noted
44	<p>The draft code falls well short from protecting pigs from abuse. The draft code allows the ongoing confinement of nursing sows in farrowing crates and only tentatively talks about phasing out sow stalls many years from now. The draft code also falls well short of standards set in many countries of Europe. I want to see far better protection for</p>	Noted

	<p>the pigs and an end to cruel confinement systems and I want to see that standards are immediately set consistent with the welfare of pigs in United Kingdom as a minimum. If the United Kingdom can present a better set of values in animal welfare, then why can't New Zealand? In fact, New Zealand appears to be in breach of the Animal welfare act 1999, in which it states that all reasonable steps must be taken to ensure that the needs of the animal, in terms of behaviour, physical and health requirements are met. Further more, Consumers do not know where their pig meat is produced. As a consumer, I want to know which country has produced my meat and what type of farming has been in place to produce this meat. I wish that all pork produce have labels showing where and how the meat was produced, in the same way that eggs are now labelled. Finally, tail docking is banned in the UK and should be in banned in New Zealand. I feel that current conditions and indeed this first draft, breaches the spirit and letter of the law.</p>	
45	<p>Although it is promising that NAWAC is proposing an eventual ban on sow crates, this draft code still seems to justify what I consider appalling 'animal welfare' conditions. I fail to see that the continued use of sow and farrowing crates in any way caters for pigs physical or behavioural needs. It is an insult to them to suggest otherwise. Imagine spending 24 hours a day, 7 days a week in a tiny cage with no natural sunlight, earth to feel beneath your feet or friends to socialize with. This type of farming is about economics, pure and simple. In total contradiction to the purpose of the Animal Welfare Act 1999, factory farming actually immeasurably increases a pig's pain and distress. Justifications on the basis of 'best practice' farming are laughable. You don't need to be an expert in the field to look into these pigs eyes and see the suffering that lies there (as recent public outrage as demonstrated). Why are submitters expected to comment on economic considerations? If this was a code for cats or dogs there would be no such consideration. Why is there such a different set of standards for animals labeled as 'food' as to ones labeled 'pets', especially when pigs have been shown to be extremely intelligent and social creatures? That is the real question that nags on my mind and the one NAWAC should be addressing.</p> <p>This code is only useful if it truly looks after the interests of the animals it purports to protect. The NZ Pork industry cannot be trusted to regulate themselves and MAF has shown itself been ineffective in policing and prosecuting cases of obvious animal cruelty (to date).</p> <p>Please do the right thing and:</p> <ol style="list-style-type: none"> <li>1) place an immediate ban on sow crates</li> <li>2) ban the continued use of sow crates</li> <li>3) ensure pigs have access to an environment that enables them to effectively meet their physical and behavioural needs (aggressive social behaviour is managed effectively by free-range farmers)</li> <li>4) ban the importation of pork products that use these barbaric farming methods.</li> </ol>	Noted
48, 50, 51, 54, 58, 64	<p>I am contacting you to express my support of your efforts to eliminate the worst abuses of pigs on factory farms. Pregnant pigs are currently confined in stalls too small for them to turn around in for up to 16 weeks. They are then moved to a farrowing crate, in which they give birth to their babies on a cold concrete floor. Most sows have two pregnancies per year, meaning that they currently spend a third of their miserable lives in sow stalls or farrowing crates. Pigs are very social and intelligent creatures (51: and here in California, USA where I live we are already putting into action legislature designed to change these conditions.) I am looking forward to witnessing mutual</p>	Noted

	animal rights efforts in your country ( or your putting into action legislature designed to change these conditions). I will follow the progress of this policy in New Zealand very closely.	
49	As a member of PETA (People for the Ethical Treatment of Animals), I passionately support the ban on sow stalls in New Zealand. Thank you for proposing a new draft welfare code for pigs that would limit the use of farrowing crates and ban gestation crates by 2017. I want to let the ministry know that I support its efforts to eliminate the worst abuses of pigs on factory farms.	Noted
52, 55, 57	I passionately support the ban on sow stalls in New Zealand! Thank you for proposing a new draft welfare code for pigs that would limit the use of farrowing crates and ban gestation crates by 2017. I want to let the ministry know that I support its efforts to eliminate the worst abuses of pigs on factory farms.	Noted
53	Please ban sow stalls. These animals do not deserve to live like this.	Noted
56	I oppose the way you allow pigs to be raised in stalls too small for them to move around or turn around it. It is inhumane and against God's will. Please stop treating God's creatures like this.	Noted
59	Thank you for showing leadership in the proposed reform to limit the use of farrowing crates and ban gestation crates. Pigs are highly social and emotional animals, so it really is fantastic that you've recognized this! Animal welfare reform gets my vote!	Noted
60	My memory of this welfare concern goes back at least twenty years so it is shameful that so much time and money is being wasted on something that should have been outlawed long before now. It is also wrong that in todays supposed more humane times we have to campaign for compassionate farm practices and that it is made such a difficult and drawn out process. I have no doubt that we will eventually have a positive change in this law and there will come a time in the future when we look back at the way we have treated factory farmed animals over the years with shame. Consumers are more aware, ethical and proactive while supermarkets and slightly questionable fast food chains are latching onto this new angle and trumpeting how wonderful they are for doing so. The pig farmers concerned have had many years to make changes. I have no sympathy for those that profit from the suffering of these pigs. I should not be about economics - it should be about what is right and what is wrong.	Noted
61	Why can't we demand better welfare practices from overseas importers? If they do not comply then we will not buy from them. Indoor farms have to become less intense and reduce stock densities and NAWAC needs to state what space is needed for each sentient pig to display normal behaviour. Farmers of indoor farms need to concentrate on ways to stimulate the captive pigs physiologically and environmentally, remembering they are cognitively equal to a human three year old. It is obvious the indoor pig farmer is required today to provide a much higher welfare standard for the pig. Society is increasingly becoming aware of the importance of choice in regards to how the food has come to the table especially with the steady rise in cancers. The only way to accomplish satisfaction for all concerned is to stop overcrowding and think less of profit and more on quality. And that is basically providing MORE SPACE.	Noted
63	The draft looks good to me	Noted
66	The Green Party submits that the National Animal Welfare Advisory Committee (NAWAC) should ban the use of both dry sow stalls and farrowing crates as soon as possible. Over the last year there has been a huge public outcry at this inhumane method of farming which pressured the	Noted



	<p>Government into reviewing the Pig Code. The current draft code needs to reflect the desire of the public to stop the use of sow stalls and farrowing crates as soon as possible. The draft Pig Code still allows for the confinement of nursing sows in farrowing crates, and fails to commit to phasing out sow stalls in the short term. The draft code's failure to commit to phasing out sow stalls within a specific timeframe is an affront to the New Zealand public who made their voice heard and demanded real change. Given the recent and widely publicised outcry towards this inhumane method of farming, the Green Party strongly recommends that the phasing out of sow stalls and farrowing crates happens as soon as possible. Scientific and anecdotal evidence shows that sow crates severely compromises the welfare of the pig, and should be abolished under section 4c of the Animal Welfare Act. The Animal Welfare Act (1999) states that animals must be allowed to "display normal patterns of behaviour" (Section 4(c)). Section 10 of the Act requires that the physical, health, and behavioural needs of the animal are met in accordance with good practice and scientific knowledge.</p> <p>Various studies of pig management systems point to the following conclusions:</p> <ul style="list-style-type: none"> <li>• Pigs prefer social interaction, and choice experiments have confirmed that they dislike dry sow stalls</li> <li>• Sows in stalls cannot exercise which results in weak bone structure and joint damage.</li> <li>• Sows in stalls have a higher basal heart rate indicating a lack of physical fitness with all the accompanying health problems that can result.</li> </ul> <p>We note that Section 73 (3) of the Animal Welfare Act (1999) states that the Animal Welfare Advisory Committee (NAWAC) may, in exceptional circumstances, recommend minimum standards and recommendations for best practice that do not fully meet the obligations of Section 10. The Green Party objects to NAWAC invoking any exemption to Section 10 as a legal loophole for the continuing inhumane practice of sow stalls and farrowing crates.</p>	
67	<p>In preparing this submission, we spoke to a farmer of free range pigs. His operation is not a small scale one. We let him know that we were seeking information for this submission. It was his opinion that the decision to use stalls and crates was an economic one, and was not driven by any consideration for the welfare of pigs. We believe that there is increasing anger at New Zealand pork producers who insist on the continued use of sow crates and farrowing stalls. The public were rightly outraged when Mike King aired his documentary on the cruel and inhumane treatment of pigs by some NZ farmers. There is strong support from the public for a strengthening of the requirements that pigs farmed under and improving the welfare of pigs. Clearly, free range farming of pigs is more strongly supported than intensive farming systems which utilise any sort of confinement. We are gladdened to see an increasing number of free range pig farms. These cruelty free operations are marvellous to behold and one sees how happy the pigs are by comparison to the other style. As consumers we prize "cruelty free" pork products above all others and simply do not purchase any pork product unless it carries a "cruelty free" label. Clearly public support is behind alternative methods of pig farming. Free range operations and group housing systems are viable alternatives that crate using farmers should be forced to adopt for the welfare of their stock.</p>	Noted
68	<p>I cannot express my full disgust and rage at the people who farm pigs in anything less than a free range fashion. Pigs are very intelligent animals and the New Zealand government has been aware of their suffering for a very long time. The Pork board and pig farmers are taking us all on a ride. They talk of "phasing out" these inhumane prisons, but these people are full of it. Clearly they are lacking of any moral conscience whatsoever, and should have no</p>	Noted

	<p>legal access to animals if this is the way they choose to treat them. These people ought to be prosecuted. In my personal opinion they should be given a taste of the treatment they inflict upon their fellow mammals. I demand the government takes harsh action against those who farm pigs in anything other than free range practices, and I urge you to monitor and punish those who fail to co-operate. Animal cruelty has no place in this world, and these scumbags treating animals like this need to be stopped and brought to justice, as soon as possible. Free range to a standard where the animals can display their natural behaviors is the only acceptable solution. For the sake of welfare and protecting our reputation as an agricultural producer and exporter. I also urge you to apply the same standards to imported pork products, to again stop animal cruelty, and to allow our more humane local pork producers to remain competitive.</p>	
70	<p>Confinement of animals in the dreadful sow crates is an abominable way to treat pigs. My family and I are totally opposed to this inhumane practice and are spreading the word amongst as many people as we can that - if they remain determined to eat pork - they should at least ensure that only meat from healthy free range pig farms should be consumed. This terrible method of farming pigs must cease! There is no excuse for NZ farmers to resort to this cruelty. Our international reputation as a clean and green, pastoral paradise is becoming irrevocably tarnished by resorting to these appalling methods of confining these gentle animals in such shocking conditions. There is absolutely no need to impose such a miserable existence on any harmless animal and these inhumane methods of farming pigs in sow crates cannot be allowed to continue.</p>	Noted
71	<p>Community opinion is mounting against unnecessary cruelty to pigs, shown by the significant positive community response in favour of pig welfare. Scientific research has shown that pigs in confinement such as sow stalls and farrowing crates with bare often sloping concrete floors display depression, stress and other negative behaviours consistent with unnecessary and cruel confinement of an intelligent animal. It is clear that the current 2005 Code of Welfare for Pigs is both non compliant with the Animal Welfare Act 1999 and in urgent need of meeting compliance with the Animal Welfare Act. A recent Iowa State University study showed that group housing was less costly and just as efficient as sow stalls and farrowing crates. The banning of sow crates in the UK, Sweden and 3 American states means that viable alternatives are currently in use!</p>	Noted
72	<p>It is time for the government to take a stand against animal cruelty, and the draft code does not do enough to stop current cruel practices in pig farming. We are appalled that sow and farrowing crates are not being outlawed immediately, as they are cruel and unnecessary. Consultation needs to be made with successful free-range pig farmers, who will testify that sows kept in appropriate conditions are incredible mothers. Of course an animal kept in enforced confinement can easily injure their young, and every animal farmed in New Zealand, including pigs, deserves to be allowed to free-range in a natural environment. It's not acceptable to treat sheep or cattle in this way, so how is it acceptable for pigs to be kept in sow crates? Animal cruelty is not acceptable in New Zealand, and sow and farrowing crates represent animal cruelty, as does allowing an animal to exist without having access to the outdoors. We need to take a stand and represent our clean green reputation. Current laws are not acceptable, and the proposed draft code does not do enough to correct the wrongs of the current laws. Pigs must be allowed to free-range at all times. The NZ Pork board must also take responsibility for ensuring pig farms meet these new rules, and be prepared to enforce them.</p>	Noted

73	I oppose the factory farming of pigs and therefore I am e-mailing my objection directly to you so that the powers that be might endeavour to STOP this practise NOW instead of pussing footing around trying to justify this inhuman and disgusting treatment of pigs taking place. It is absolutely shameful to think that this practise is allowed to continue in New Zealand. After watching Close up on Friday 9th April 2010 I was absolutely appalled that a NZ vet would justify the treatment of these animals in some of the farms shown in the news clip, he only seemed concerned with the pigs physical condition ie. their weight, but what about the conditions the pigs and piglets were living in, it was absolute filth. If I was a farmer, I would be ashamed to think my animals would have to live in such conditions. Somebody should be held responsible for the incompetence of these farmers, I believe the farmers who leave their animals in conditions like this should have a bloody good kick up the backside, they are just lazy. The pork board should be tougher on these individuals instead of constantly protecting them and their livelihoods.	Noted
77	It is again a sidestepping and procrastination of the real issues by NAWAC - their call for code changes could have been much stronger, so often their main concern is for the wealth and convenience of the animal abusers. The pig industry's continued excuses and threats to protect their wealth have obviously not been effective overseas where these animals' needs are considered more important. In order for New Zealand to stand honestly behind claims of animal welfare and 'green' policies, all factory farming of pigs and chickens should be banned. We have the space and the support of the majority of people for all these animals to be reared 'free range' so that all food products are 'cruelty free'. Most people would be prepared to pay more and enjoy their food knowing the animal concerned had access to outdoors and its behavioural needs were met. What price does New Zealand and NAWAC put on cruelty?	Noted
78	I am writing to submit my objection against factory farming of pigs relating to the Draft Code of Welfare for Pigs. I believe there is no place for this type of farming in NZ. I strongly disagree with the practice of factory farming of any type of animal and urge the NZ Government to condone this inhumane practice and take a stance against this type of cruelty. The vast majority of my friends, family and acquaintances are also totally against factory farming – we are ordinary NZ'ers, not activists or greenies who are usually reported on in the media, and we want this stopped.	Noted
79	Again last night the media brought up the disgraceful conditions of the pigs in dry sow stalls. This is upsetting to see, cruel and unnecessary. I WILL NOT buy sow stall pork, ham or bacon, and hope many others don't either, so this barbaric lifestyle for pigs ceases.	Noted
82	Animals may indeed be 'destined' for the supermarket refrigerator section, but they deserve to have a decent, happy life as we all do. If you were to 'keep your meat' in your backyard, would you keep them in such conditions? We go to zoos and see animals in cages, but would we happily take our children to visit animals in 'factory farms'?! If there is nothing wrong with it, and it is a learning experience and it is ethical, then why not?.....because we all know that it is not a suitable place to take our children, and they would be distressed by what they saw. So, as you can tell I am opposed to factory farming of pigs, and any other animals for that matter. It all comes down to 'out of sight, out of mind'. So long as it is not there, evident in our every day lives then it is okay because money talks, and as animals have little say, we have to speak for them!	Noted
84	I have had scientific input into the SAFE submission on the draft code of welfare for pigs, and I agree with all the points made. I wish to make the following additional points regarding sow stalls and farrowing crates. Regarding OIA request: I request that NAWAC look into corrupt practices within MAF as part of its wider brief of	Noted

	allowing the public to make informed submissions on Codes of Welfare. The Ombudsmen will eventually force MAF to release the document, but it will be after the date for submissions close. Since this information has been withheld through no fault of my own, but through deliberate delaying tactics by Mr Sherwin, I request permission to send in an additional late submission based on information in the document, if appropriate.	
85	I'm absolutely sick of how powerful the farming lobby is that you keep allowing such an unbelievable level of cruelty to continue as long as they turn a profit. Farrowing crates and sow crates are not acceptable. Every New Zealander can see this. The Animal Welfare Act should protect these intelligent creatures as it states that those responsible for animals must meet their "physical, health and behavioural needs". I don't care if they look well fed, of course they do, they plan on killing them for their meat. But the medicine required to keep these animals looking healthy in such conditions is astounding. I am happy to pay more for pork if it means the animals are well treated. I stopped eating pig when I saw the conditions they are living in. I would happily buy bacon again if I knew farmers were giving these animals the respect they deserve. Physical, health and behavioural needs are not being met in pig farms in NZ. In Scotland I saw many farms with pigs living happily outside. Pig farmers pollute our waterways and mistreat their animals. Stop being such a little prick and do something about it, Minister. Stop doing whatever the farming lobbyists tell you to do, you look pathetic. Take action, you won't be remembered for anything in your little time as a Minister unless you do something great.	Noted
86	I am opposed to the recently Draft Code of Welfare for pigs for the following reasons. The Draft Code if implemented will facilitate the continued suffering of pigs. The Draft Code is in breach of the Animal Welfare Act which states that animals should be allowed to display their normal range of behaviours. For the next three years, thousands of sows will continue to suffer in sow and farrowing crates for much of their lives. From 2013, sows can be confined in sow and farrowing crates for up to 20 weeks per year until 2018. From 1st January 2018, confinement to farrowing crates would still be legal for around 10 weeks per year. Sow stalls will not be banned until January 2018. Specified minimum sizes of sow crates have been removed.	Noted
87	I am glad of the opportunity to comment on the Animal Welfare Code for Pigs. I am very concerned about any method of permanently housing Pigs (or any animals) indoors. The ethical question of doing this to sentient beings seems to be a complete side- or even non-issue in New Zealand, though clearly the problems related to this practice aren't as invisible as ethical issues, evidenced by the need for minimum standards. The argument against the cruel practice of using farrowing crates and dry sow stalls does not need to be made here. NAWAC is aware that the practice is cruel and contrary to the Animal Welfare Act 1999. My recommendation on farrowing crates and dry sow stalls, therefore, is that there has been plenty of time for the industry to see the writing on the wall and that the practice be stopped, immediately. Hand-in-hand with this, Government must legislate to ban the importation of any pork from overseas farms either altogether or certainly from farms where dry sow stalls and farrowing crates are used. If further prevaricating wins the day on farrowing crates, then NAWAC and a government department or research company that understands project management should undertake the research, analysis and an implementation of a non-farrowing crate practice to be established and in operation in 2012. The Pork industry can be consulted of course, but to expect them to carry out the activity impartially with a result favourable to animal welfare seems to be deliberately and mischievously defeatist of NAWAC.	Noted

88	<p>The only justification for the maltreatment of pigs in commercial operations is economic. This is not a valid reason as many pig farmers raise pigs commercially without keeping pigs restrained. If we fear imported pork replacing New Zealand raised pork then we need only place constraints on importing pork i.e. forbid the importation of pork from countries that do not have equivalent standards to New Zealand. When is it acceptable to maltreat an animal? - when there is money to be made? If pig farmers cannot farm pigs without resorting to poor practices then it would be better that they no longer farmed pigs. Lest you think me some soft animal rights type I can assure you I have no hesitation in killing pigs for food, but they have never been locked in a shed, or jammed in sow crates, and as a consequence they display normal behaviour. The modern indoor approach to pig farming is flawed because it fails to appreciate that these animals are intelligent; at least as intelligent as dogs.</p> <p>As my final comment I would like to see pig farmers thinking outside the square, and not simply hiding behind archaic practices because "that's the way we do things". It would be nice for farmers to change their practices without resorting to forcing them to change; for farmers to come up with ideas themselves to meet changing consumer perceptions.</p>	Noted
90	<p>The Pork Board claim that only a small percentage of New Zealand bred pigs are 'factory farmed'. If this is so, then it will not cause undue economic hardship to have this small proportion of pig farms shut down or converted to methods where the pigs can live their short lives in less miserable conditions. The Pork Board could channel the funding earmarked for defending these inexcusable practices, into subsidising conversion costs for the reputedly small number of farmers involved. As for the claim that pork is imported into this country from places with no restrictions on the method of production, once consumers can be confident that NZ pork is humanely produced, they can refuse to buy imported pork and the Pork Board will have a very useful marketing tool with which to boost sales in the domestic and export markets. What is the point of having a National Animal Welfare Advisory Committee, if we are to continue to see harrowing footage on our television screens of atrocities being inflicted on animals which are perfectly legal - ie sanctioned by NAWAC?</p>	Noted
93	<p>Pigs are sentient too, and as such deserve equal moral consideration with other sentients in matters where there are no other morally relevant differences. But just as there are no morally relevant differences between sentient humans, however different their physical or mental needs or abilities, to justify denial of the basic rights not to be enslaved, tortured, or killed, so there are no morally relevant differences between pigs and humans with regard to these matters, and thus no grounds to deny pigs such basic rights either. Now in addition to being holders of basic moral rights, most pigs have fine senses and bright minds suited to navigating a rich and challenging life in a highly complex and varied natural environment. Like most humans they require both suitable physical and mental stimuli to keep these faculties exercised, and can suffer physical pain and mental torment if deprived of such. In severe cases such deprivation can amount to torture. Exploiting pigs by farming them for food violates their basic rights not to be enslaved or killed. But in addition, some intensive farming practices, such as depriving sows of the opportunity to engage in normal physical, mental, and social behaviours by confinement for extended periods in dry sow stalls or farrowing crates, amounts to a violation of the basic right not to be tortured. The farming of pigs for food is completely unnecessary. Humans do not need to eat meat, indeed they thrive without it, and even the total abolition of the pork industry would not violate any basic rights. Therefore it is not necessary to consider whether other</p>	Noted

	farming methods intended to replace the use of dry sow stalls and farrowing crates might not result in better pig welfare. The alternative exists not to farm pigs at all.	
94	I will not comment on questions 2 - 8 apart from expressing my view, which I am sure is shared by the vast majority of New Zealanders, that pigs should be kept in clean, roomy, temperature controlled conditions, with comfortable bedding material to lie on. They should have adequate daylight. To conclude: We in New Zealand pride ourselves on our farming tradition. However pig farming as it stands in New Zealand is shameful. Changes for the better need to be made, and made quickly.	Noted
98	I am delighted to see that pigs should enjoy a better quality of life under the new Code of Welfare, however I am concerned about the pork coming from overseas that may have been produced in worse conditions than New Zealand pigs. I feel that imported pork products should have to comply with, or exceed the New Zealand Code of Welfare for pigs. Without doing so New Zealand farmers will have to compete against the lower prices that can only be achieved through keeping pigs in undesirable conditions – something I strongly believe New Zealand should not support. Without doing so I can only foresee that more meat will be imported, and pigs will continue to suffer, though not in New Zealand. In addition, not doing so could have detrimental effects on New Zealand's pork industry. When the United Kingdom improved conditions for sows, the cost of UK produced pork increased, and the industry halved (The New Zealand Farmers Weekly, 2010, p. 5). Of course the product was simply replaced with imported product. According to Sam McIvor (NZ Pork) "Every dollar a local pig farmer earns contributes \$1.92 to our economy; a dollar paid for imported pork contributes only 78 cents". It is essential, not only for the welfare of pigs, but also for the benefit of our economy, that there are restrictions placed on imported pork products.	Noted
102	The Animal Welfare Act is being constantly breached by the pork industry and the factory farmers of other animals and birds when the care, comfort and ability to exercise, have fresh air, forage for food, form social groups and nurture young according to their own instincts is compromised by cruel cages and crates. This breaching of the Act is being allowed by government after government because of an unwillingness to upset powerful farming lobby groups and industry boards. Set a date by which ALL pigs farmed in this country will be free range. We constantly hear that if factory farms are outlawed then we would just see massive imports of cheap imported pork. Along with this spurious argument goes the smug assumption that pigs are better treated here than anywhere else pork might come from in the world. This is clearly not the case seeing as we have institutionalised cruelty happening right here in NZ, as we have all seen on our television screens. There is a solution though to this perceived problem: Compulsory country of origin labeling Capitalizing on being a cruelty free and humane society - making it a point of difference from other producer countries and encouraging New Zealanders/consumers to be proud of being such a society. Every year that you drag your feet about protecting vulnerable animals further condemns thousands of individual pigs to a brutalized life. These are highly intelligent, social animals and they don't deserve to suffer so that people can eat cheap cuts of their flesh.	Noted
103	I consider the use of sow crates for any reason whatsoever, to only be in the interests of farmers in their desire to make even greater financial gain. No consideration is given to the needs of a pregnant animal who needs are to walk and move around freely, and be able to relieve the discomfort of being heavily pregnant. Free range pig rearing is viable and sustainable. Until it is, I will continue to refuse to buy pork that is not free range.	Noted

104	I wish to express my horror at the amount of total cruelty allowed in our country. Confining any animal as is allowed in "sow stalls" or "farrowing crates" is appalling. This abominable practice must stop, as must all factory farming in a land that promotes itself as 'clean, green and caring'.	Noted
107	NAWAC, in its draft code, had not fully recognized the mood of the country regarding the issue. The proposed dates for the phasing out of crates have continuously been put forward. As the cruelty of factory farming, as well as the environmental effects, have been disputed for years, farmers have had considerable amount of time to make preparations and start the phasing out process, as many already have. The code should not therefore put undue emphasis, as it does, on supporting the farming industry. The code does not meet the physical or behavioural needs of pigs and must be amended significantly to do this..	Noted
108	In the late 50s for about 25 year's we kept upto 1000 pigs 100 sows usually 6 boars. We also bought in some weaners. They were free range. Anyone who manages any animals or birds in al conscious should see that have decent satisfactory condition to live. And as little stress as possible. The New Zealand Pork Industry Board should stop dithering about or be sacked. Chef Jamie Oliver on TV showed pigs kept in Europe and England like that. I never dreamt it was happening here. After seeing those poor sows on Mike Kings TV program I stopped eating ham, bacon and pork. It made me sick to my stomick. I know of other's who have done the same. Keeping highly intelligent sows as breeding machines who are forced to live in small revolting concentration camps. You call farrowing crates. There should be lot's more Inspectors, for free range pigs as well. Plus every product on sale well labeled. Change the law and get on with it. These ghastly pig-farming practice, are not going away. While you all Stall for time.	Noted
109	<p>Whilst WSPA recommends the more humane group housing or free-range systems in preference to the use of farrowing crates and dry sow stalls, we applaud the New Zealand Government's move to limit the use of farrowing crates and dry sow stalls to four weeks, with the view of prohibiting the use of dry sow stalls in the near future. Finland, the Netherlands, Denmark and the United Kingdom have already passed legislation to ban sow stalls. If New Zealand fails to keep abreast of these animal welfare improvements it runs the risk of damaging its international reputation of being a leader in animal welfare and a responsible exporter of agricultural products. These European laws have arisen because of the recognition that the sow stall system is totally incompatible with the welfare needs of pigs. The European Scientific Veterinary Committee (SVC)'s 1997 report The Welfare of Intensively Kept Pigs concludes unequivocally from the scientific evidence that sow stalls should not be used. It's recommendations are stated in the submission.</p> <p>The SVC's report along with a number of other scientific studies have noted a wide range of health problems for sows that are either caused or made worse by confinement. Pigs are highly intelligent, inquisitive animals and there is abundant scientific evidence that they suffer when deprived of environmental stimulation and the opportunity to explore their surroundings. Common types of abnormal behaviour include stereotypies, apathy, depression and lack of responsiveness. All of these are indicators that the sow is having difficulty coping with her environment and show that her welfare is not good. Sows are social animals and have a need to establish a social hierarchy among themselves in order to avoid or resolve conflicts. As the SVC pointed out, this is usually impossible for sows in stalls. Ethological studies of sows carried out in Sweden in the 1980s, when nearly two thousand social interactions</p>	Noted

	between sows were observed, found that sows need to interact in order to resolve conflicts. Sows do not become well-adjusted to living in sow stalls. On the contrary, studies have found that the amount of stereotypical behaviour increases with the length of time the sow is confined over several pregnancies. Lack of exercise adversely affects the bones and muscles of sows confined in stalls. Lameness, physical deformity, skin injury, gastrointestinal problems, heart problems, constipation and urinary tract infections are also more common in caged sows. Other references cited in submission.	
110	To keep sows inc rates until 2018 is absolute cruelty. To make no attempt to make a minimum size for the crates during that time is also the utmost cruelty. You would not accept that your family dog be kept in these conditions surely!	Noted
111, 131 132	I consider the draft code released by NAWAC in March 2010 to be unsatisfactory. I request that it be redrafted and that NAWC forward to the Minister of Agriculture a new code providing for a ban on the use of sows stalls and farrowing crates. They are extremely inhumane and confining pigs to such pens is both harmful to the animals and immensely damaging to New Zealand's international reputation. European and American consumers are extremely sensitive to animal welfare issues, and their awareness that New Zealand is continuing to treat pigs in this way is likely to prove extremely damaging in terms of lost exports to this country in years to come.	Noted
117	I consider it highly desirable that a humane code for the welfare of farmed pigs should be implemented as quickly as possible. Current intensive practices are abominable and not something that any civilised society should accept. The proposed code is inadequate both in its protection of pigs and the time-scale of implementation. I regard intensive farming of mammals as undesirable and unnecessary particularly in New Zealand where the weather is relatively mild.  Provided adequate shelter is provided pigs should be farmed on a free range basis as are sheep and cattle. The simple fact that there are profitable free range pig farms in New Zealand only emphasizes the personal and workplace inadequacies of pig farmers who oppose a humane approach to pig farming. To summarise: Pigs are intelligent sentient creatures requiring higher levels of welfare than most mammals. Much of the draft code is irrelevant serving only to legitimise intensive pig farming with its use of stalls and crates. There are no compelling commercial reasons preventing the universal free range farming of pigs in New Zealand.	Noted
122	The Minister of Agriculture wrote to many New Zealanders, ourselves included, last year stating his abhorrence at the pork farming practices that are permitted in New Zealand, and claiming that animal welfare is an absolute priority for this government. Now that the issue is able to be positively addressed, it is sad that the Government-appointed body, NAWAC, does not feel bound to address these concerns that are of paramount concern to the Government. Instead it has come up with a limp, apologetic document that will prolong cruel practices that should be unacceptable in any civilised society. It brings to mind the sugar merchants who protested that abolition of slavery would be a financial disaster for their industry. Sow and farrowing crates should simply be banned. This is not unrealistic as there are a number of pork producers in New Zealand who operate without such confinement practices.	Noted
124	The following is a presentation I made as part of an Animal Care course I am currently completing, and I would like you to read it and think about how you would feel as a pig, or any animal kept in these conditions. It was written	Noted



	from the pigs point of view and is made on behalf of all intensively farmed pigs in New Zealand.	
126	I am dismayed to read that the confinement of pigs in stalls and crates is likely to continue until 2017. Seven years for the phasing out process far exceeds the time it should take for farmers to adjust to managing pigs humanely – the issue continues to be dragged out and in the meantime, pigs continue to suffer. Perhaps they should seek advice from the farmers of free range pigs on how to farm them correctly. A move away from intensive farming would be advantageous to New Zealand's image overseas – buying a product promoted as natural, organic or free range is very desirable. May I suggest that if NAWAC are concerned about farmers having to compete with cheap overseas pork from countries with no animal welfare codes, that restrictions and tariffs be applied to those products. This would also assist in encouraging better conditions for those animals overseas. My family have not bought pork (except for free range product), since the disturbing programme that aired last year, after which Mr Carter stated that he was equally disturbed. Perhaps imaging life as a pig confined in these stalls would be a good start to changing the mindset of farmers. How are animals able to express 'normal patterns of behaviour' where they are not even able to turn around? I am hoping that this and the many other submissions you will receive will be taken into account. However, given that we still see sickening images of layer hens cramped together in cages (we also only purchase free range eggs) and life did not improve for them after public objections, I do not hold out much hope for the pigs.	Noted
127	Dear Sirs, as a member of the free world it time to refrain from animal abuse and cruelty.the cave-man days are over. Please treat these animals in a humane way.	Noted
133	The view of NAWAC that sow stalls and farrowing crates should be phased out is laudable, but the clarification 'not until key criteria can be met' removes any real commitment to implementing changes. NAWAC and the pork industry have had 5 years, since this statement was made in the 2005 code, to research and innovate humane systems, but are still prevaricating. In the meantime hundreds of pigs are living in substandard conditions. The argument that more pig meat will be imported from countries with worse welfare standards if the price goes up can be countered if regulations are put in place that prevent this.	Noted
134	The Standard reflects only a resistance to change in fear of backlash from the NZ Pork Industry. It is and adjustment of current practice, not a reflection of good practice. The rebuttal regarding aggression and economic issues are untrue, as can be seen from the fact that 4 million sows in the EU are already housed successfully in alternatives, either in groups indoors or free range. My submission is focused on animal welfare first and foremost. I believe New Zealanders will wholly support a change and pay the extra price for ethical farming practice. It is clear success and productivity is driven by professional management and experienced stockmanship. Pig farmers need to take more responsibility for the behaviour requirements of pigs. There is more than enough evidence available regarding the current suffering pigs in New Zealand are forced into, and this cannot be ignored any longer. I see the cost of renovations incurred by a complete ban more financially viable for farms in the long run, rather than the cost of renovations needed for a restriction to 4 weeks. The Pork Industry cannot claim they will be suddenly disadvantaged by a ban. The pressures of consumer demand on the welfare for pigs being used in meat production has been building for 10 years, I do not believe for one minute the NZ Pig industry have not known consumers want a change in welfare standards. I believe if we do not make a move towards banning dry sow stalls and farrowing	Noted

	crates now, NZ will fail in making a change for better welfare standards. It is possible the code will not be reviewed again until 2020 and that is not good enough.	
135	<p>I am not a member of any welfare organisation, I am just making a submission as a member of the public who is concerned at the current welfare of pigs in New Zealand. One of the biggest concerns of commercial pig farmers appears to be the increase in costs from new standards. It is exactly this preoccupation with personal profit over pig welfare that means that a review of the code is required. If these farmers had been meeting the animals' physical, health and behavioural needs, and had been alleviating the animals' pain and distress, then there would not be such a public outcry over pig farming conditions. Commercial pig farmers who have been benefiting from providing the lowest form of comfort for the pigs up until now will find it difficult to match the low costs that accompany such a method of farming. They need to accept that this "minimum standard for maximum profit" is not acceptable, and that changes will involve higher costs. They should not benefit from having done so little for the pigs' welfare up until now, by being given almost a decade to change their systems. It is up to them to work out how to manage these higher costs from a business viewpoint, not up to us to accommodate their lack of foresight for animal welfare. Those pig farmers who are already being responsible owners and already have good standards in place will have been absorbing the higher costs for years and competing against others who have lower standards and subsequently lower costs. We should not be pandering to farmers who have adopted the minimum input for maximum output approach. I believe and submit that four years is plenty of time for people who are motivated to change their systems.</p>	Noted
138	<p>My submission is that the Draft Code, if adopted in its present form, would be unlawful. In summary:</p> <p>(a) Many of the proposed minimum standards would, if adopted, wholly fail to comply with the requirements of the Animal Welfare Act 1999 (the "Act"), particularly s 10 (imposing an obligation to meet the physical, health, and behavioural needs of animals) and ss 29(a) &amp; (h) (which prohibit the ill treatment of animals); or to meet the purposes of the Act.</p> <p>The offending minimum standards that are addressed in this submission<sup>1</sup> are:</p> <ul style="list-style-type: none"> <li>(i) Minimum Standard No 12 – the continued use of dry sow stalls and the unreasonably protracted time frames for implementing both the 4 week restriction and the eventual ban on their use;</li> <li>(ii) Minimum Standard No 11 –the continued use of farrowing crates and the lack of any time frame for phasing out their use;</li> <li>(iii) Minimum Standard No 6(b) – inadequate minimum space requirements for indoor group housed pigs;</li> <li>(iv) Minimum Standard No 13 – inadequate minimum space requirements for boars;</li> <li>(v) Minimum Standard No 6(f) – inadequate requirements for light.</li> </ul> <p>There are many others, such as Minimum Standard No. 17 – elective husbandry procedures – but to address them all is outside the scope of this submission and so I have focused on the main ones.</p> <p>(b) The "exceptional circumstances" provision in s 73(3) is a high threshold test. The public law principles governing its application are discussed in paragraphs 2.14-2.17 below. On the information publicly available, the test is clearly not met in respect of any of the non-complying minimum standards. Any recommendation of these minimum standards in their present form by the National Animal Welfare Advisory Committee (the "Committee") would</p>	Noted

	<p>constitute a misuse of its statutory power.</p> <p>(c) These minimum standards, if adopted, would not therefore be lawful. Given the status of the Code as delegated legislation made under the Act, its validity could be challenged in a judicial review proceeding in the High Court. Any decision of the Committee to recommend the issue of a Code in the form of the present draft would similarly be vulnerable to challenge.</p> <p>(d) The current review is an opportunity for the Committee and the Minister to remedy the obvious failings of the current 2005 Code. However, the Draft Code, as presently formulated, would simply continue a management regime for pigs that is best described as grim, and fails to meet the most basic obligations of the Act.</p> <p>(e) Rather than continuing to pay lip service to the requirements and purposes of the Act, the Committee and the Minister are urged to fulfil their statutory and public law obligations.</p> <p>In conclusion, the minimum standards for pig welfare have for too long utterly failed to comply with the most basic and fundamental requirements of the Act. The s 73(3) "exceptional circumstances" provision has until now been invoked too readily and without sufficient justification. It is submitted that the Committee and the Minister should, in completing the balance of this present review process, take steps to fulfil properly their statutory and public law obligations. The proposed new minimum standards as presently drafted would not satisfy those obligations and would be unlawful and vulnerable to judicial review (as are the current minimum standards).</p>	
141	<p>I support a much stronger code that takes effect much sooner and better protects the interests of pigs. I quote Pundit writer Claire Browning piece as my submission: 'Saving the piggies' bacon from the draft welfare code' by Claire Browning in Politics section of Pundit. "NAWAC's draft welfare code for pigs, on which submissions close this week, is conservative, and not supported by the experience of free range pork producers, who speak openly to Pundit about their pigs."</p>	Noted
142	<p>I would further comment that the industry has responded very poorly to this issue. A labelling system where pork produced from "happy pigs" could be readily identified by the consumer (as is currently the case with eggs) would reassure the public that steps are being taken to address welfare issues. Unfortunately, the attitude and actions of industry have achieved the reverse. Furthermore, it appears doubtful to what extent industry representatives actually represent the opinion of many farmers. I would strongly recommend NAWAC have little regard to protestations put forward by industry representatives.</p>	Noted
144	<p>After reading the Review of the Animal Welfare (Pigs) Code of Welfare, we lack confidence that the National Animal Welfare Advisory Committee (NAWAC) will phase out these appalling confinement systems soon enough despite widespread public opinion. In 2004 NAWAC said that it supported the phasing out of sow stalls and farrowing crates. That was six years ago and nothing has changed.</p> <p>This is our submission calling on NAWAC to:</p> <ol style="list-style-type: none"> <li>Uphold the principles of the AWA and</li> <li>Ban sow stalls and farrowing crates immediately. Pigs have suffered long enough.</li> </ol> <p>The New Zealand Pork Industry Board has heavily lobbied NAWAC in a desperate attempt to retain their cruel sow stalls. When reading the review document it is obvious that NAWAC has bowed to this pressure despite public awareness and the outcry against unacceptable human behavior exhibited in the farming practices of our New</p>	Noted

	<p>Zealand pig farmer. Pig farmers want to use both sow stalls and farrowing crates, which will mean that sows would still be confined to such an extent that they can't turn around, for 20 weeks per year. This is totally unacceptable. Sow stalls and farrowing crates are in breach of the obligations of the Animal Welfare Act 1999. NAWAC has demonstrated that it places the financial interests of a minority of pig farmers ahead of both animal welfare and of the economic interests of New Zealand as a whole. NAWAC continues to argue that stalls and crates cannot be phased out until other "viable options" for pig farming are developed. That is unacceptable nonsense. All that NAWAC needs to do is consult with free-range pig farmers, who will show them that they have been successfully farming pigs without confining them. Claims about problems with non-stall farming are an excuse by greedy pig farmers to continue unacceptable farming practices. It is time now for action. Let this be the year in which there is an end to the callous treatment of these farmed animals, especially the cruel confinement of pigs. We are disappointed that the draft code does not call for the immediate banning of sow crates and stalls. Instead it proposes new limits for the amount of time they can be used after a sow has given birth (four weeks) and it proposes to ban the use of sow stalls for all uses eventually, but does not commit to any date as to when this would happen. This is not acceptable and we demand that NAWAC commits to phasing out sow crates immediately. We know that pigs are very intelligent creatures with a well developed social order and which are, given choice, by nature clean in their toilet habits. That standards imposed on them subject them to isolation, boredom, ammonia saturated air, unnatural birthing situations, in short physical and emotional cruelty is to us absolutely and totally unacceptable. These draft proposals need a drastic rewrite to bring them into the 21st century where people practise compassion, not only spell the word.</p>	
145	<p>I am concerned that the proposed Code for Pig Welfare does not protect those animals from primitive and barbaric practices. I host many overseas visitors for 11 months of each year. These people are visibly shocked when they see TV footage of the horrors of some NZ pig farms. Some of them come from countries with little legislation pertaining to animal welfare, but they expect more of NZ standards. They have perceived NZ as 'Green', they know that NZ people fight for whales and native species, they cannot understand that the same nation can, due to weak legislation, allow cruel treatment to be inflicted upon farm animals. Pigs have been mistreated for many years, this is New Zealand, this is the year 2010, it is high time all NZ farmers were required to operate under strict guide lines of animal welfare. If in doing so, they are unable to make a living, then they should not be farming. There can be no justification for continuous mistreatment of animals. Finally, the import of overseas meat should be banned.</p>	Noted
146	<p>Firstly, well done to NAWAC for carrying out this review and putting together the research, recommendations and new draft Code of Welfare for Pigs. Generally the intentions are good and the recommendations are all in the right direction, reflecting the public and consumer concern.</p>	Noted
154	<p>It is my considered opinion that NAWAC should heed the mood of outrage and distaste that there is in the public arena at the considerable suffering endured by factory farmed pigs. Their suffering is all the greater because of the intelligence of pigs. I enclose but a few recent petition forms (131) as an example of the public's desire to seek change in the conditions under which these animals live.</p>	Noted
157	<p>The factory farming of pigs, especially pregnant sows and sows with piglets, deliberately flouts these freedoms. I</p>	Noted

	<p>submit that the extensive use of sow crates and farrowing crates constitutes extreme cruelty and neglect of such pigs. Many breeding sows will spend their entire lives in one form of crate or another. I contend that this is wilful cruelty because it is carried out knowingly by pig farmers. The 'AWA' makes a clear distinction between wilful cruelty and other kinds of cruelty. Wilful cruelty attracts much harsher penalties. It is impossible to believe that factory pig farmers are not aware of the physical, health and behavioural needs of pigs in their care. That being so, such farmers are deliberately using management systems for pigs that woefully fall short of the complex needs of pigs. In light of these needs, it is appalling to realise that if any other animal apart from factory farmed pigs and poultry were subjected to the lifestyles of these pigs and poultry, the owner would be liable for prosecution for wilful cruelty. It is not difficult to imagine the immense suffering of pregnant sows and mother pigs. These animals are sentient, intelligent with well documented natural behaviours that cover all aspects of their lives. The factory farming of pigs in New Zealand denies these animals all of these behaviours.</p> <p>A sow crate is 60 cm wide and 2 metres long. The sow cannot turn round. Her only exercise is a few paces backwards and forwards. I believe there is at least one case being investigated by MAF where the crates are smaller than the legal limit. Pigs kept in these crates and farrowing crates have been shown to be bored, exhibiting stereotypic behaviour such as bar biting and head waving. They also show signs of clinical depression, stress, apathy, frustration and anxiety. They are also hungry. While their nutritional requirements are met, they cannot be fed a diet to satisfy hunger because they have no exercise. Pigs are kept on concrete or metal floors. They suffer leg weakness and overgrown feet. Heavily pregnant animals need to be able to move about to ease their discomfort. I submit that it is extreme cruelty to confine a heavily pregnant sow to a crate. It is clear that the New Zealand public find the factory farming of pigs, especially the use of sow crates and farrowing crates, abhorrent. Both NAWAC and the Pork Industry are well aware and have been for years that present practices are unacceptable. They are placing financial interests before animal welfare. In doing so they are making a mockery of the AWA.</p>	
159	<p>I believe that the "Draft Animal Welfare (Pigs) Code of Welfare" as provided for public consultation does not comply with the Animal Welfare Act. Specifically pigs held in conditions outlined in the code cannot exhibit normal patterns of behaviour, are more susceptible to disease and there is a lack of hard criteria against which the conditions under which pigs are kept can be monitored by for example MAF inspectors. In addition, there are many instances in the code where the industry is responsible for setting the standards. This is unacceptable. An independent body must set the welfare standards.</p> <p>Another concern is the tone of the document. It reads like it is very conciliatory to the pork industry and not at all sympathetic to the welfare of the pigs whom it is meant to be representing/guarding. Almost the only redeeming feature of this document is NAWAC's affirmation that it will eventually phase out sow crates. The "eventually" is a sad indictment on NAWAC's position as a guardian of animal welfare. It seems to me that it is not NAWAC's job to be concerned about the impacts on the industry, only concerned about the welfare of the pigs.</p> <p>Surely, if the NAWAC or the Pork Board is worried about this, then it should lobby government to place restrictions on imported pork such that only pork from pigs raised under certain welfare conditions is allowed to be imported. Afterall, we do this with fruit &amp; vegetables where track and trace requirements allow MAF to know what pesticides</p>	Noted

	<p>etc have been applied to the imported fruits &amp; vegetables.</p> <p>NAWAC also asserts that "While there is a lot of investigation into alternative farrowing systems there is not yet any indoor system that NAWAC considers will provide better welfare for the lactating sow and her piglets at this time." Why does the system have to be totally indoors? We, as a Nation, have just rejected the idea of housing thousands of cows in sheds in Otago. New Zealand, unlike many countries has a climate that allows our farm animals to enjoy outside living. Why not a compromise where adequate shelter sheds are provided for pigs in outdoor areas?</p>	
160	<p>It seems to me that the Pork Industry Board, while giving qualified lip service to the introduction of measures that would make these animals' lives more bearable, is fighting tooth and nail to save its members expense and any lessening of the profits they currently enjoy. At least one member of the Pork Board was caught, some years ago with dead, dying and injured pigs in his sheds at his farm in Levin. He was quite casual about the whole affair and apparently received no punishment. His excuse for the lesions on the sides of many of his animals was that "pigs are bigger now than they used to be". I personally have no faith in the Pork Board's stated desire for change and hope that the Government will be able to take a strong stand against its bullying. It is apparent that many, many factory pig farms are places of misery and torture and fall far below the recommended standards in the Code. Despite publicity over recent years, nothing seems to have changed. The main concern seems to be that if New Zealand pork producers don't supply enough meat, then it will have to be imported. This is nonsense. New Zealand has plenty of food and doesn't have to rely on pork to keep it going. What if pork was produced here naturally and was thus more expensive? It would become a delicacy for special occasions and we would be none the worse for that. It's sickening that producers are trying to create a taste for a product which they can only meet by using animals as "things" and keeping them in misery for their entire lives. The whole industry (along with battery farms) is a real blot on our so called "clean, green" image! There is little justification to keep animals in crates or cages as an acceptable farming practise. We need more farmers with good husbandry skills and those who respect their stock and are willing to spend the time to look after them. Who would allow dead, dying and sick animals to lie around in filth? Some of our pork and egg producers.</p> <p>I think that codes of welfare have little effect unless Inspectors are appointed to keep an eye on the situation. This would obviate the need for people to break in to farm sheds to see what's going on. I note that the Pork Board may appoint monitors for this purpose, but I feel that these would need to be independent of the Board to give a true indication of conditions.</p>	Noted
161	<p>There is much discussion on the state of piggeries and the treatment of pigs within the commercial operations of piggeries that are not free range. Looking at the basic makeup of the Committee I am compelled to ask 4 questions:</p> <p>1 – Have they spent a few months watching the pig workers in the piggeries, observing the animals, looking carefully at their behaviours, their physical appearance, their mental demeanour, how the workers treated them, etc.?</p> <p>2 – Scientific backgrounds don't relate well to empathy for animals, especially if experimenting on animals/vivisection was part of the degrees some of the Committee have earned. What do they have to say on this issue?</p> <p>3 – Have they observed free-range piggeries such as Freedom farms or smaller businesses that take into account,</p>	Noted

	<p>traditional pig behaviours.</p> <p>4 – Are they prepared to back a port board member's behaviour in using even smaller illegal cages, which is a disgusting (emotive I know but how else can I convey my disgust knowing how little value these people place on the animals they make their money from) and callous attitude in cramming even more animals in to increase their profit margin.</p> <p>The fact that this pork board was able to control the government's actions by threatening court action says a lot about the government's weakness or its intention to do nothing but pay lip service to public instruction to government.</p> <p>International judgment will reduce this country's standing in the competitive struggle to export. That is a serious warning that government should pay careful heed to.</p>	
163	<p>The world is paying a very high price for our habit of eating farmed animals, both environmentally and in terms of our attitude to other living things and thus each other. The price of the product should reflect the true cost. We must first decide on a moral code that we can be proud of, and then let the product price find its level. Not the other way round.</p>	Noted
164	<p>We and family members have been submitting on the reviews of pig welfare codes at every opportunity for the last 15 years or so, and yet nothing has changed. Successive processes have argued that there are no feasible alternatives to current housing methods, and that voluntary codes will allow changes in production over time, that such changes while needed, should be phased in so as to not undermine the viability of pig farming. However, pig farms continue to operate with totally unacceptable and inhumane methods (using sow crates and farrowing stalls), even after all these years. Clearly the voluntary approach has failed the objectives of animal welfare requirements, it has failed the wellbeing of the pigs and it has failed all those of us who have made submissions through the years demanding better treatment for these animals. Given the importance of this issue to pork consumers, these processes have failed consumers as well. Regulation is clearly the only thing that will make the required change to improved animal welfare. The use of regulations to ensure the disuse of farrowing crates and sow stalls as well as better pig management overall is the only viable alternative to ensure animal welfare standards and consumer demands are met.</p>	Noted
165	<p>Please make it a regulation or law that pork that does not meet these standard from overseas suppliers is not allowed to be imported into New Zealand. This will help to protect New Zealand pork suppliers from going out of business. Consumers will simply have to bear any extra costs associated with moving to the new standards however I believe that's something that as New Zealand consumers we need to accept.</p>	Noted
167	<p>More should be done to incentivise Free Range and less intensive pork and poultry farming. Let's show the world we aren't just paying lip service to animal welfare codes!!! Most bacon is manufactured from cheap imported pork originating from countries which probably often have even lower production/animal welfare standards than ours. Obviously this creates an unfair situation for local producers so any code changes should address this issue too. "Country of origin" labeling on food products is long overdue in this country and we should not be buying food items that have been produced where animal cruelty is perpetrated.</p>	Noted
168	<p>Generally, I agree with the aims of the document because the code currently legitimizes the neglect of pig welfare.</p>	Noted

	<p>Pigs are more intelligent and socially interactive than most animals and have greater capacity for human-like behaviour than New Zealanders typically realize. For this reason, claims about pig behavioural problems should be treated more critically than for other animals and sound pig welfare policy should incorporate behavioural management. The draft pig code of welfare does not reflect these needs. The draft code's focus on confinement and neglect of behavioural aspects ignores the influence that more holistic farming practices have on pig welfare. Pigs that are provided with adequate feed, shelter, space and attention do not display behavioural problems. This is supported by the fact that the majority of pig farms do not use confinement systems. It has also been found that pigs stimulated during rearing are more approachable as adults. Perhaps the reason for the neglect of behaviour-based solutions is the failure to transfer behaviour management research findings onto farms and onto policy analysts' desks. As the scientific evidence for the justification of pig confinement systems is scarce and there is ample evidence for behaviourally based alternatives, I recommend that the pig welfare code phase out all confinement systems. I suggest instead that NAWAC steer pig farmers in the direction of behaviour management approaches by regulating that pigs be fed a nutritional diet and provided with sufficient natural materials for them to sleep on and root in. As to the question of how quickly to phase out confinement systems, I suggest that decisive leadership will provide the best chances of success. The suggestion that such change will put New Zealand pig farmers out of business overlooks the loyalty of New Zealand pork consumers and the move to 'animal welfare accredited' products. (References cited)</p>	
172	<p>The criteria that must be met before the dry sow and farrowing crates are phased out in new Zealand are completely unattainable. Why is there an obsession with competing with factory farmed animals from countries with appalling human and animal rights records? New Zealand is not trying to compete with factory farmed Chinese beef, so why the double standard with pork? This country has had totally ineffective welfare codes for pigs since the first one in 2001. The same issues have been raised over and over again by animal welfare groups [and don't forget NAWAC - that is MEANT to include you] and every time the outcome produces the same old rhetoric, with such soft phasing out options and standards, the pig industry will just wait for the public to vote with their wallets [as the egg industry has had to with battery farmed eggs] before they agree to any real improvement in animal welfare. As an organisation, NAWAC is meant to lead the way in improving animal welfare. Sadly my observation is that it follows at some safe distance behind, instituting changes only when they have already been begrudgingly accepted by the industry involved when it finally bows to public opinion and ultimately public choice.</p>	Noted
173	<p>Factory farming is one of SAFE's primary campaign issues and our aim is to have it prohibited on the grounds of its inherent cruelty and inadequate animal welfare standards. SAFE has extensive resources, knowledge of, and experience in addressing animal welfare and rights issues. As an animal rights advocacy organisation, SAFE promotes a compassionate lifestyle without reliance on animal-derived products. From this perspective all farming systems involve some level of cruelty, and this is what inspires SAFE's campaigns, especially against factory farming. The comments made in SAFE's submission must be seen in this light and are interim steps towards a society where animals are no longer exploited by people.</p>	Noted
174	<p>I had thought that considering intense public condemnation of animal cruelty, and the clear link between acceptance of cruelty to animals and the preponderance of crimes of violence against humans, the new draft Code of Welfare</p>	Noted



	<p>for Pigs would make a substantive change in the way pigs can be treated. Instead, I am shocked to see that it reads like a code of continued crimes of persecution against pigs, condoning their imprisonment in frightful conditions for a further six years. This means thousands of intelligent, feeling pigs will be forced to endure suffering daily for the sake of profit and nothing will be done about it. New Zealanders are speaking out against animal cruelty in the farming industry. The draft code of welfare for pigs actually endorses procedures that if practiced against some other animals can result in prosecution for an act of cruelty. Now is the time to address this hypocrisy. You must know that the people of New Zealand have woken up to what real welfare for pigs means – No crate confinement and NO factory farming. It is absolutely unacceptable to only plan to phase out these known cruelties after a six-year period. You must make the change that needs to be made to treat pigs decently now.</p> <p>NAWAC and The Minister of Agriculture have responsibility to the people of New Zealand to ensure that The Code of Welfare provides real welfare for farmed pigs, not excuses for inflicting intense and ongoing suffering on them by forcing them into confined spaces and denying their natural behaviours. Profit for the farming industry and keeping a competitive edge against pork imported from other countries are not acceptable reasons for pigs to be treated badly. I am holding out for an ethical code that ensures pigs are protected from intentional harm at the hands of humans. I request that the draft Code of Welfare for Pigs be reviewed with ethically robust farming practices and animal wellbeing as primary assumptions. Farmed pigs should be free-range and provided with generous indoor and outdoor spaces, their physical, emotional, social, intellectual and psychological needs met in such a way by the farmer that they are able to live satisfying lives. Killing should be as stress-free and painless as possible.</p>	
175	<p>I am currently farming pigs in Canterbury. I have been farming pigs for 3 ½ years. My farm is a family farm, and we have been here for 30 years this year. We run a 300 sow farrow to finish operation. I am an equity partner of our operation. My family relies solely on the pig farm for our income, so the changes proposed by NAWAC potentially have a huge effect on our profitability. The farm employs four full time staff, which in turn supports 4 families. Where possible we buy our feed locally, use local transporters to cart our stock to market and feed to farm. Expenditure last financial year was just over \$1.2M.</p> <p>We choose to farm our pigs indoors, we believe that this enables us to care for our animals in the very best conditions possible. Allowing the animals to be protected from the extremes of the weather, whilst providing a warm clean environment to ensure the best possible hygiene for our animals. There is absolutely no doubt that a happy &amp; healthy pig is the best producing and fastest to market. This is always our goal. Indoor farming is a much more capital expensive way to farm pigs, but we believe it gives us the best welfare for the pigs and for us financially. I support a welfare code and believe it provides a good base for all people caring for pigs to reasonably achieve. New Zealand is a relatively expensive producer of pork. The changes put forward by NAWAC will put us at further disadvantage against imported products. Currently pig meat is able to be imported meeting no welfare code whatsoever. This clearly puts NZ farmers at a disadvantage. It also allows us to consume without conscience. It is an awful double standard, and shows politician's do not actually care at all for pigs.</p> <p>The use of gestation and farrowing crates is accepted practice internationally. Working towards removing these tools will put NZ farmers at a further disadvantage against international competitors. The proposed changes will mean higher costs for the additional housing requirement for loose pens and fewer pigs born per sow per year in the</p>	Noted

	<p>farrowing area which greatly impact on productivity levels as well as competitive advantage.</p> <p>A good animal welfare is crucial to successfully farm pigs in today's environment. Therefore the code must ensure that we provide good welfare for our animals, but still allow us to compete with internationally produced product. Consumers have shown us time and again that there number one buying decision is around price, not welfare or country of origin. So inferring that consumers will happily pay more for higher welfare NZ pork is incorrect. The code must be based around science and facts to determine what is truly best for our pigs, and not what an outsider to the industry may think from a first impression. It is my experience that most people outside the pig industry have very little understanding of what pig farming entails. Most seem to believe pigs roll in mud and eat scraps, where in fact commercial production is quite different.</p> <p>I am not sure what is used as a bench mark or an ideal scenario for a welfare code. But I do know that no system is perfect. Pigs in the wild do not enjoy the same protection from disease and the environment as farmed pigs. Farmed pigs have been breed and selected to perform in the intensive conditions in which we keep them, that is why we enjoy the exceptional productivity we get today. Pigs are not people and we can not be certain how they experience the world, therefore we have to rely on science and facts to understand what is best for our animals and what is not.</p>	
177	<p>Why we consider the new draft code regressive, still barbaric, and therefore unacceptable. NAWAC's proposals ensure the continuation of widespread suffering to pigs through the coming years. NAWAC appears to have forgotten that severe confinement of sows, denying them the opportunity to express normal behaviours and causing them stress and pain, breaches the Animal Welfare Act.</p> <p>It is clear that NAWAC has bowed to pressure from the pork industry and despite the Minister's direction, is NOT putting animal welfare ahead of the financial interests of pig farmers, thus allowing profit to take precedence over crucial animal management practices. We all know that the sow crate allows the greatest number of sows per unit of space (and is therefore greatly favoured by the pork board and industry) but at huge cost to the suffering pig. We reiterate: NAWAC is permitting profit and financial interests to take priority over justice &amp; compassion. After much research and study of pig farming we have concluded that pigs should be farmed only in areas that are appropriate to outdoor, free range, supervised methodologies, thus allowing the animals their right to –</p> <p>We submit that NAWAC should: learn from the best of overseas practices Examine how more enlightened and humane nations are handling their pigs. Sow stalls have been banned in Sweden, Switzerland and the United Kingdom. Farrowing crates are severely restricted in Sweden and Switzerland. Their use is restricted in Sweden to 1 week.</p> <p>Questions to NAWAC committee: If any of you are still capable of feeling in a normal way, we'd like to know the following: How would you respond in severe confinement day and night for the rest of your life - without being allowed to exercise your painful joints and muscles, without the joy of feeling sunlight and fresh air, often lying in your own faeces and urine, unable to exhibit any normal and instinctive behaviours? Would it send you mad? Would you exhibit severe stress reactions? Would you finally enter a state of deep depression so that you don't even react when a bucket of water is thrown at you, or you're prodded with sticks? (This was part of a study finding). And if you answer smugly, "but you're anthropomorphising. I'm not an animal. They don't feel such things", then consider that science has already revealed that the pig is closer to human intelligence and awareness than any</p>	Noted

	<p>other mammal and that he/she is also a highly sensitive being. And before you say 'Tosh', we'd say "Go away and educate yourselves", not by listening to the old school, calloused, toe-the-party-line establishment advisors, scientists, and vets - but by the real people, the younger independent-minded experts who have done the real research.</p> <p>NAWAC has claimed that stalls and crates cannot be phased out until other "viable options" for pig farming are developed. That is an untenable position to take and reeks of pig farmers leaning on you. As one of our barristers said: "All that NAWAC members have to do is to speak to free-range pig farmers, who will tell them that they are, right now, successfully farming pigs without confining them. A free-range farmer accurately described the claims about problems with non-stall farming as "poppycock". NAWAC, the time for action is now.</p>	
178	<p>In preparing this submission, the NZVA asked for comment not only from the Pig Veterinary Society (PVS), but also all the Special Interest Branches (SIBs), the Animal Welfare Focus Group, the NZVA Board and the general membership. While it is clear that there are differing ethical viewpoints on the way pigs are farmed in New Zealand, only to be expected in an organisation as large as ours, the majority of responses from those representing SIBs other than the PVS was that we should rely on the expert advice of those veterinarians involved with pigs on a daily basis.</p> <p>We find the code somewhat confusing in the way that it is written because there is a tendency for the section contents to be incorrectly assigned (as specified in the 2009 Guidelines for Writing Codes of Welfare) to the introduction/minimum standards/recommended best practice/general information, or, at times, – doubly assigned. The words “must” and “should”, for example, appear in some introductions, when these are simply supposed to provide a rationale for the standards. Examples of this are given under specific comments.</p> <p>We reiterate our concern at the widespread use of the terms ‘acceptable’ and ‘acceptable to the industry’ in both minimum standards and example indicators. While some of these have been addressed, references remain to these terms, as well as to the NZPork website. Our understanding is that these should be NAWAC - as opposed to industry – standards, if NAWAC is to avoid laying itself open to criticism of capture. The information should be available in the code itself.</p>	Noted
179	<p>NAWAC reiterates the opinion expressed in the 2005 Code of Welfare that NZ pig farmers should remain competitive with producers of imported product. While NAWAC evidently wishes to strike a balance between farmer profitability and animal welfare, the fact is that the majority of pig farmers conduct a profitable business without the use of pig crates. Moreover, NAWAC is charged with preventing animal cruelty under the Animal Welfare Act. This is your prime responsibility in preparing a code of welfare. Please make an explicit and unequivocal statement that animal welfare is the code's primary focus.-</p> <p>Consumers today are highly aware of the health risks of factory farming and are becoming far more knowledgeable about what pig farming entails. People have turned against cruel farm practices. Consumers increasingly demand assurance that what they choose to eat is cruelty-free. Few will choose cheaper imported product if the NZ pork industry was able to label its products not simply as "New Zealand-produced" but as "New Zealand-produced to ethical animal welfare standards". The draft code fails to reflect higher public expectations of our farming industry. NAWAC must genuinely put forward minimum standards that are progressive and humane.</p>	Noted

182, 183	I am writing to voice my concerns over the factory farming of pigs. Profit does not excuse neglect, ill treatment, and plainly disgusting farm practices. We would not tolerate the behaviour of some of these farmers if we imported from them, we cannot tolerate these conditions within our own country.	Noted
185	I would like you to use your influence to ensure that sow and farrowing crates are banned nationally and the Animal Welfare Act 1999 is upheld. This action would create a loophole so cheap pork imports from countries like Canada and Germany could come into New Zealand. It is essential that this loophole is closed by legislation also banning the import of factory-farmed pig products so New Zealand will be an ethical pig farming nation.	Noted
188	Legal submissions regarding intensive pig farming. Under the NAWAC's current code pigs are permitted to be kept in such confined areas that they cannot even stand up, this is clearly inconsistent with their natural behaviour and breaches section 10 and section 4 (c) of the Act. More importantly , pigs suffer physical health problems such as lung and heart disease, leg problems, lameness bruising, foot erosion due to bare concrete floors and lack of exercise which is in breach of section 4 (c) of the Act. Only under exceptional circumstances, may NAWAC recommend minimum standards and recommendations for best practice that do not fully meet the obligations of the Act in particular section 10. It is submitted that NAWAC have adduced no evidence and therefore have no grounds supporting circumstances sufficiently exceptional to create exemptions from section 10 of the Act in the welfare code. Thus the welfare code is ultra vires and intensive pig farming is illegal.	Noted
190	I am familiar with all aspects of pig production, health and welfare (rather than welfare in isolation. Thank you for the opportunity to make a submission on the draft Animal Welfare (Pigs) Code of Welfare dated 3 March 2010. While there are many comments I could make on the draft Code, many of these are of little or no consequence and relate to detail rather than substance. I do not wish to burden you with these nor have my main concerns lost amongst these. Rather I wish to comment on three very important and substantive issues that have arisen in the draft Code. These are: the use of dry sow stalls: specifically the intention to prohibit the use of these completely from some as yet to be determined date, Minimum Standard 12 (d); the use of farrowing crates: specifically the limiting of their use for four weeks after farrowing, MS 11 (d); the space requirement for grower pigs: specifically the inference that the minimum space allowance is to be calculated using the formula $0.033 \times BW^{0.67}$ and that when ambient temperatures are above 25°C, the formula $0.047 \times BW^{0.67}$ should be applied, General Information page 14.	Noted
191	Now is the time to rebuild and strengthen our nation, and reshape it into the country we can be proud of. No one takes pride in profit over humanity, or profit via suffering. New Zealanders want the intensive farming of pigs gone - this is evident in the media attention and public outcry. If the government does not act on this, then it neglects its duty as our representatives. Make the change you want to see in the world - a world without suffering. Get rid of the archaic practice now. If NAWAC can already see that sow crates need to be phased out, then do it now. Acknowledging cruelty is one thing - delaying the abolition of said cruelty is criminal. This Code is not up to the standards demanded by the people of NZ or by the Animal Welfare Act itself. I recommend that it is not accepted in its current form, but redrafted to give effect as soon as possible to the acknowledgment that intensive farming is cruel (this does not mean as soon as "convenient"). If a few farms have to suffer financially for this, then so be it.	Noted

	That is the cost of morality.	
193	<p>NAWAC's key criteria for phasing out sow stalls and farrowing crates as pointed out above includes pork producers in New Zealand remaining price competitive with overseas producers who have cruel practices. I strongly disagree that we should wait for the rest of the world to change before improving our pig welfare code to the point where it meets the physical, health and behavioral needs of pigs. We didn't wait for the rest of the world to improve our labour practices and recognise workers' rights. This increased costs to New Zealand producers (so made them less price competitive) but we acted because we recognised that workers actually have needs and feelings and are not just machines. On top of having a pig welfare code that meets the physical, health and behavioral needs of pigs, I would also like to see MAF put these same welfare standards on imported pork. This would stop any 'exporting of the welfare problem' and would put New Zealand producers on a level playing field with imported pork, in terms of animal welfare. However, regardless of whether this happens, the New Zealand pig welfare code must meet the physical, health and behavioural needs of pigs. NAWAC's draft code does not meet these needs.</p>	Noted
196	<p>We oppose the indoor farming of pigs. On animal welfare: These are purely about efficiency and profitability. On the surface this would seem like great business practice, but pigs are not products or inanimate objects to be manufactured or processed like car parts or soft drink. New Zealand is fast growing a disturbing reputation for animal abuse and a factory pig farm is nothing more than legalised abuse. For the most part farmers in New Zealand have had a love of the land and a basic respect for their livestock. Many of these animals have enjoyed the basic freedom of being able to roam pastures and eat grass; behaviour that is typically natural of these livestock. We have a good reputation for farming sheep and cattle, so why do we continue to allow the abuse of pigs? Confining pigs to crates, barns, stalls etc for long periods of time is inhumane. These pigs effectively become prisoners with very little "opportunity to display normal patterns of behaviour." Indoor Factory Pig Farms are completely unnatural. Anyone who has ever owned free range pigs will know that pigs like to exercise, they like to roam around pasture; even adult pigs like to run, and to play sometimes. They like having the choice of whether to eat grass or not. In fact many breeds of pigs should be eating grass as part of a natural diet. Pigs like being able to move away from their own waste, they like being able to scratch against trees and fence posts. Pigs are incredibly intelligent creatures deserving of our respect. Pigs are generally farmed for human consumption and for human wallets and they do not have a choice in the matter. Isn't that enough of a sacrifice? If NAWAC continues to allow indoor factory farming then you are effectively classing these pigs as products to be manufactured, rather than as animals to be cared for.</p> <p>Although we completely oppose Indoor Factory Pig Farms we understand that it is not possible to instantly shut them down. We believe there should be a strict deadline of 2 years for phasing these out. If this means that in the short term pork products become scarce and a luxury item then so be it.</p> <p>Health implications: We believe there are serious health issues involved in the indoor farming of pigs. We believe these companies are seeking to ensure their pigs cannot exercise so they do not burn as much food as they normally would. Factory farmed pigs are generally fed an unnatural diet of grains, corn and whatever other 'goodies' these corporations have discovered will increase their profits. These foods will also very likely contain GM grains.</p> <p>International reputation: By continuing to allow the indoor farming of pigs we contribute to the loss of New Zealand's</p>	Noted

	clean, green image. Other countries are picking up on consumer trends and changing their attitudes towards farming, sustainability, organics, environmental issues, etc. We feel it is important New Zealand does the same. As an isolated country with a reasonably good image internationally we need to be working towards improving our agricultural and business methods to enable this country to improve and sustain its image. We should be embracing more natural methods and embracing free-range farming.	
199	I ask that you please take one minute to visit the following web site that I have created for New Zealand's Twitter community. Here you will find over 300 other New Zealanders who also believe that stalls and crates must be banned immediately. <a href="http://www.saveourbacon.org.nz">http://www.saveourbacon.org.nz</a>	Noted
203	This is an email asking to please treat pigs the way a person should be treated, with respect. They are animals which are eaten, but it does not give the right to put them in small cages and treat them unfairly. Please have sympathy upon them	Noted
208, 213, 233, 235–238, 264, 277–296,	<p>I am writing to both voice my dissatisfaction with the NAWAC review process on animal welfare, as well as to make my formal submission on the review of the draft pig code which is currently taking place. I have little confidence that the NAWAC can protect the welfare of other animals because they have specific instructions to take economic issues into account when addressing animal welfare. The best example of this is section 73 of the Animal Welfare Act 1999. This section allows for economic issues to take precedence over the wellbeing of other animals. Institutionalised cases of animal cruelty continue because of this section of the act. Practices such as the use of crates for containing pregnant pigs, and the use of cages for layer hens have been approved by the NAWAC because of this section of the act. What is concerning is that the Act maybe being misused. The specific wording in section 73 is that such practices may only be approved in “exceptional circumstances.” However, it has been used instead to defend the main institutional forms of cruelty to animals. For example, the use of crates to house approximately 30,000 pigs hardly sounds like an exceptional circumstance. For these reasons I have little confidence that the NAWAC can protect the welfare of other animals. However, I wish this letter to be passed on to the NAWAC as my formal submission on the review of the current draft pig code.</p> <p>To phase out the use of dry sow stalls by 2018 is inadequate and ensures that this cruel practice will continue for the next eight years. Whilst businesses should be allowed time to transition to humane methods of pig farming, eight years is too long a phase out period. If we are to compete with overseas imports we must have a comparative advantage. Currently, we do not. If, however, we are able to brand our pork as humanely raised this will give us an important advantage. I would like to see the use of dry sow stalls phased to only four weeks per pregnancy by the end of 2011 and the practice banned by the end of 2012. This will allow businesses time to transition but will ensure that the transition is effective. Businesses are likely to continue the practice even after it has been banned. This means that a ban in 2018 will not mean the practice will have stopped in 2018. This is because animal welfare laws are very hard to enforce. This is due to many reasons, lack of resources being a primary reason.</p> <p>A petition is being circulated by a group in Wellington asking for the use of dry sow stalls to be phased out within five years. This petition has been signed by almost a thousand people and only started in February. Public support for this practice to be banned is strong. A government which takes these issues seriously will perform well in the next election, because they have helped boost our economy through ethically just ways.</p>	Noted

209, 210, 216, 301	I appeal to you to help to bring about a change in pig farming. (It sickens me to the core that New Zealand treats a living creature in this manner.)	Noted
211	<p>If NAWAC concludes that stalls must go and that the "k" factor for growing pigs should be increased by 10% then there will be costs in farmers making the adjustment, and there will be costs from reduced production and farmers will not in any way get compensated via the schedule for these costs. The biggest cost from banning stalls will be borne by sows who will suffer greater negative welfare outcomes because they are now forced into groups with few feasible devices yet available to farmers to handle their well being. This is particularly relevant during periods when larger sows are in oestrus and will typically ride fellow weaker sows which aren't strong enough to resist. Such moments typically occur during the first 4 weeks of pregnancy, the period most desired by the industry for stalls. Stalling for the first four weeks of pregnancy also allows the individual feeding of sows that are weaned with low condition to regain some body mass before they are forced to compete for feed in a group situation. The correct outcome is for stalls to remain available to farmers for at least 4 weeks post mating but the farmers are to be audited through the industry's own robust auditing programme to ensure farmers who don't use stalls properly, leave the industry. The same auditing procedure should be used to set the appropriate "k" factor for space allowance calculations with 0.030 as the absolute minimum.</p>	Noted
212	<p>If what we are told by the Pork Industry, that in fact the industry in New Zealand is at best marginal, is true, then it is little wonder that they are reluctant to adopt humane but more expensive farming practices. I have witnessed first-hand the conditions in which sows are confined long term and I am always left wondering how people are able to see animals in such conditions day after day without being affected by their obvious suffering. I assume the difference is that I see the animal as a living thing and they see it merely as a stock number. I fail to understand how as so called "sophisticated" beings we can allow such suffering to take place. With respect, NAWAC has hardly covered itself in glory in its attempts to bring about meaningful welfare codes and in my view lacks the strength to stand up to the powerful farming lobby. I suspect that very little NZ Pork is exported as the industry continually refers to the 45% of imported product that makes up the New Zealand market. It therefore uses as its excuse not to be proactive in the elimination of long term use of farrowing crates, the fact that this 45% imported product comes from intensive factory farms - of course the industry is in a catch 22 - it cannot highlight the appalling conditions from whence this product comes - simply because it uses similar practices in New Zealand - therefore there is no point of difference.</p> <p>Farmers using such practices have been aware of public disquiet and disgust at the use of these stalls for many years, but have chosen to do nothing - believing that their excuse of having to compete with a 45% imported content in their market would see them exempted from adopting humane farming practices. If a farmer cannot make money farming humanely then they should exit the industry - perhaps moving to China to skin live cats - but their current farming practice is not acceptable in New Zealand and should not been sanctioned by a Government whose current Minister of Agriculture has publicly expressed his concern at the conditions revealed last year on television of a local pig farm.</p>	Noted
219	My first objection to the new draft is that the recommendations still violate the Animal Welfare Code which states that animals should be able to express their normal innate behaviour. We are not short of space in New Zealand,	Noted

	and free-range pig farmers are doing well, so I cannot see the need for intensive methods. Surely we, as a developed country, should be in line with the standards in the European Union and other developed countries!	
228	We are good employers. Good custodians of the land and the welfare our animals is our No.1 priority as it should be. We received an environmental award in 2005 for our stewardship of the land and the way we farm.	Noted
245	I am not a left wing loon or hippie, but a National voting dairy farmer. I have always made sure the animals I farm are treated well, and think everyone should have to do the same. The pork industry has argued these methods are necessary, however the fact that sow crates are no longer in used some European countries proves this wrong. Free range farmers in NZ also seem to manage just fine. Knowing that we live in a society where animals are made to live in conditions where they can't even turn around is just not right. Humans are omnivores who need to eat, it is only natural, but surely in the 21st century meat can be raised in humane conditions. I don't understand how anybody capable of feeling the human emotions of compassion & empathy can think sow & farrowing crates are acceptable.	Noted
251	We believe that with appropriate management and increased investment, staff skill levels will improve which will also assist to improve animal welfare and the perception of the industry. We will support the improvement in Animal Welfare Standards. For these reasons a commonsense timeframe is needed for the proposed changes to be implemented.	Noted
257	If the Industry is unable to improve profitability and farm performance, then ultimately there will be no pig farming in New Zealand and New Zealand's pork requirements will alt be sourced from imported product.	Noted
253	I would point out that my commitment to the welfare of my stock is extremely high as everyone in the industry knows you cannot farm pigs successfully if it isn't. Each year we buy and use over eight hundred tonnes of grain from local growers which is \$275,000 they have, to inject into the local economy that they won't have if pig farming becomes untenable in the future due to untoward pressure from outside influences. A similar amount is spent on proteins, other meal ingredients and animal health. Local transport companies receive around \$50,000 also, which is directly related to the pig enterprise. Clearly, we contribute in a not inconsiderable way to the local and wider economy! Pig farming is a difficult occupation, with many obstacles, so to not be profitable would be the beginning of the end but for me, and all pork producers I know, the pig's welfare has to come first. I'm concerned that the many people who are driving the changes to our industry through the revised welfare code don't realize that pig farmers will exit the industry and those left will be no better off because cheap, subsidized imported pork will take their place and nine times out of ten it will come from much lower welfare practices than our own!! This fact can't be reiterated enough!	Noted
257	I am very concerned at the appalling condition under which pigs are still kept on pig farms.	Noted
259	I am very concerned about the mistreatment of pigs in New Zealand and would appreciate a copy of the draft revised code as soon as it is available for public consultation.	Noted
260	We are committed, responsible farmers. We pride ourselves on our farming practice. For example (attached a pictorial description of environmental initiatives on our farm), which was a case study featured in "Supporting Exceptional Environmental Stewardship in the New Zealand Pork Industry" (Sustainable Farming Fund Project	Noted



	07/028).We are as committed to provide high standards of animal welfare as environmental excellence.	
261	<p>It was my farm on which protestor John Darroch chained himself to a feed silo. A quick check on 'google' shows that John Darroch is publicly described as a vegan, and has been involved publicly protesting a whole range of issues – including the presence of the Israeli tennis player at the Auckland Tennis Open; at MFAT in Wellington against climate change, and whaling. I accept that all persons have a right to their own views. However I take issue with the gross misrepresentation of this vegan saying on National Television that the animals around him had no quality of life: the photo above of my sows which were less than 10 metres away.</p> <p>I wish to point out to NAWAC that the Animal Welfare Act sets out the legal requirements on which the standards in welfare codes are based in order for animals to be properly cared for. These standards are required to reflect science and good practice. I respectfully ask that NAWAC recognise my practical experience as described above, and my commitment to the welfare of my animals and my land, in order to continue farming and contribute to New Zealand's economy. NAWAC should note that vegan protestors are unlikely to be satisfied while meat production continues.</p>	Noted
262	<p>As of any business there is an essential requirement to make a Profit!! This is for the good of our suppliers and all parties involved all the way to our customers/consumers. A key component of any profitable livestock farming operation is efficient productivity from its given species. Intensive pig farming has evolved over a large number of years now to meet these needs. Systems have been developed to meet the needs of the modern genotype to provide an environment to allow these animals to produce efficiently. It needs to be recognised that animals will not produce unless ALL essential components are provided ie Food, water, health and environment primary components of good welfare and management.</p> <p>Intensive farming has a significant lower environmental foot print than other farming systems and is essential to feed the worlds growing need for protein. All intensely populated countries have relied on it for some time and even our dairy industry is now recognising it and implementing it rapidly.</p> <p>The present systems in use on NZ pig farms are consistent through out the world. These systems are continuously being fine tuned to meet the needs of all our partners, the environment, neighbours and consumers. NZ as a large importer of pig meat with its relatively open borders makes the local production very sensitive to local volume of production, international price and supply and consumer demand. The NZ producer needs to be very responsive to the Consumers of our products demands both welfare wise and price. We now supply a perceived welfare friendly product for the small population that demand and can afford it. Unfortunately tho a simply analysis of the trend in consumption shows a slowly declining local production and an increasing importation of meat that doesn't meet NZ welfare standards.</p>	Noted
263	<p>We have grown our business over the last 30 years starting with sows in paddocks and farrowing outdoors using "A Frame" huts. However, after trialling indoor farrowing and housing sows indoors in groups we considered an outdoor operation had many disadvantages in relation to pig welfare and the economics of farming pigs. For example, winter chilling of piglets; heat stress and sunburn in summer; high mortality due to overlays from the sow; danger to staff from aggressive pigs and poor sow reproductive results.</p> <p>Our business relies on the best welfare standards for our animals. They will not provide positive outcomes without</p>	Noted

	care and high stockmanship. It is abhorrent to me that a vegan base extremist group can put enough pressure on normally well balanced individuals to make mandatory unbalanced rules and regulations. I am totally committed to animal welfare but expect any proposed rules must include welfare, science, health and safety that is economically viable for the producer. The regulations should not be based on political or emotive views. I trust that NAWAC will develop a balanced code.	
272	PIC welcomes the opportunity to comment on aspects of the code, which have been updated for the benefit of the welfare of pigs and the successful operation of the New Zealand pig production industry. PIC would like to congratulate NAWAC for the standard and content of the code produced.	Noted
273	<p>I have tried to anticipate the change in public opinion regarding dry sow stalls and avoid being caught with facilities that are no longer publicly acceptable. I have tried free range farming and have marketed my pigs separately, attempting to gain a premium for being welfare friendly. For a few years I achieved a premium of 30c/Kg, but supermarkets complained that they could not justify running two separate categories of pork and cancelled the project. I have been paid the same as all of the stalled sows for the past six years. I am financially disadvantaged in running sows outdoors. I do not get the same production as I did when my sows were housed in stalls. My piglet mortality is higher (18-20%), sow health is poorer, and there are much higher labour requirements. I am having difficulty in finding suitable new land to lease and the cost of lease land is becoming prohibitive. Comments to the effect that "consumers are prepared to pay more for pork that is grown in a welfare friendly environment" are not correct. The extra that they will pay is small, and only for a small volume of pork. In general the consumer will happily agree that pigs should be raised free range, but when it comes to paying more for the product, they do not back up the sentiment with hard cash at the supermarket till.</p> <p>My concerns about the proposals that would require pig farmers to phase out stalls completely are:</p> <p>Few pig farmers have the land to go to outdoor systems.</p> <p>The high capital cost of building new sheds, and the uncertainty of resource consents make building any new shed a risky business</p> <p>Imported pig meat is raised in countries where gestation stalls are used through the full pregnancy, giving it a cost advantage</p> <p>Many existing pig farmers will not upgrade from existing stalls, going out of business instead. This will result in fewer locally produced pigs and greater reliance on imported product.</p> <p>Any move to limit the use of farrowing crates can only be contemplated when good alternatives are available that do not reduce our economic competitiveness with imports.</p> <p>I support other aspects of the draft standards. I think that most of the standards are common sense to pig farmers. We run successful and profitable farms by ensuring that the welfare our pigs is given top priority. A happy contented pig is also a profitable pig. I urge you to have regard to the submissions of pig farmers and the Pork Industry Board, and help retain a viable New Zealand pig farming industry.</p>	Noted
274	Federated Farmers of New Zealand supports the principles behind improving animal welfare in New Zealand and is committed to the maintenance of animal welfare standards that comply with the Animal Welfare Act 1999 and the Codes of Welfare promulgated by NAWAC. As an organisation we do not see it as acceptable to intentionally allow	Noted

	<p>animals to suffer as a result of poor farm management practices, deliberate ill treatment or neglect. In relation to the Pigs Code of Welfare Federated Farmers submits that more consideration needs to be taken on the economic, science and management practice side of pig farming. Section 9 (2) (a) of the Act requires that the behavioural needs of animals be met in accordance with both good practice and scientific knowledge. Productivity is an important aspect of good practice. Adverse effects on animal productivity and farmer's profitability must be given appropriate weighting when considering Minimum Standards as reduced profitability can have a detrimental impact on ongoing animal welfare. NAWAC needs to be mindful of how much scrutiny is applied to an animal's physical, health and behavioural needs and how this intersects with the practical aspects of farming animals. The animals farmed today are the result of years of intense genetic selection based around developing animals that are best adapted to our farming systems.</p> <p>Before any changes can be made to the current code it is critical to consider the practical aspects of phasing our sow stalls and other current management practices. Farmers require confidence that alternative systems deliver both better welfare for the pigs and enhanced productivity for their business. As noted by NAWAC stockmanship is the key aspect of welfare and farmers need to be confident that they have the human resources with the appropriate skills to manage new systems. There is also a need to consider the international trading environment and the need to stay competitive against imported pork products that do not have the same animal welfare restrictions as New Zealand is promoting. On this matter Federated Farmers submits that New Zealand must adopt a realistic position on management requirements and ensure alignment internationally with worldwide requirements. This includes our key markets and trade competitors.</p>	
275	<p>From my very considerable investment in the New Zealand pig industry — both financially on my own farm, and personally in my industry leadership role - I believe I am well placed to make very relevant comment on the draft welfare code, the draft economic analysis, and the real implications for the future of the New Zealand pork industry, within the international context of pork production and marketing. Most critically, I know pigs, having cared for them many long hours over many years. I have not addressed the scientific detail, which is covered in NZPork's submission based on expert input from the industry's technical advisers. I fully support NZPork's submission.</p> <p>I also want to draw to NAWAC's attention that there is a down-side of outdoor farming (despite climatic suitability): that is, the greater susceptibility to air-borne disease. I am in the very unfortunate position of experiencing first-hand the devastating blow of PMWS on my own farm in 2006: PMWS spread very quickly around outdoor breeding units in the relatively pig- dense Canterbury region. I believe that the mixed farming systems practiced in New Zealand is a very positive aspect of a resilient industry.</p> <p>I have attached NZPork's letter to the Minister of Agriculture, Hon David Carter, dated 5 February 2010. The Minister has responded that the code review process is in NAWAC's hands and he is awaiting NAWAC's recommendation. I wish to ensure that all these points are submitted for consideration in NAWAC's deliberations. Therefore please consider this letter as a component of my submission.</p> <p>NZPork met deadlines and provided information as requested at each point of the process but NAWAC has failed to provide the expected and agreed reciprocal actions. This is evidenced by three key failures:</p> <ol style="list-style-type: none"> <li>1. NAWAC failed to present robust evidence and reasoning and to engage in constructive discussion around the</li> </ol>	Noted

	<p>use of sow stalls</p> <p>2. NAWAC dropped the only person with specialist pig knowledge out of the latter half of the code writing process. This neglect was instrumental in the changes to grower pig spacing being put into the code with absolutely no welfare basis. As the New Zealand Veterinary Association's submission to NAWAC dated 26 January 2010 stated: "Therefore, components of [the draft Code] are produced without the input of any person with direct experience with, and knowledge of, pigs."</p> <p>3. The economic analysis failed to accurately assess the impact of a ban on sow stalls due to wrong assumptions and wrong application of NZ pork industry data - stemming from a lack of understanding of the industry and the commercial reality of the marketplace. MAF did not discuss and review the results with NZPork as agreed. We sought an independent economist's critique of the draft economic analysis to check our views of the economic analysis. This critique confirmed that fundamental assumptions in the model were wrong, and that the draft analysis was seriously compromised as a decision aid.</p>	
276	<p>I am very proud of the fact that following a visit to our pork unit last year by 10 persons associated with establishing the pig farming code of practice, the senior veterinarian sought me out, shook me by the hand and said Rob this is the best pig farm I have ever visited in New Zealand. Our pigs are good and they look good. Sure you get your deaths, but that is part of farming.</p>	Noted
297	<p>Exhibition of natural behaviour is not necessarily a good measure of animal welfare. There are many instances on our farm where we would argue that we have enhanced the pigs welfare from that in the natural environment. For example the housing of pigs per se actually improves the pigs welfare in our view – by reducing the animals exposure to variation in environmental conditions such as extreme cold and wind, rain and wet soil conditions, hot burning sun etc. Imposing human emotions to the welfare of animals is also not necessarily a good way of judging welfare particularly by people who have little or no experience with pigs. We would contend that animal productivity – something we can measure, is a better measure of animal welfare on the basis that if an animal is continually stressed it will not be very productive.</p> <p>Outdoor or free range pig production is portrayed as being the panacea of good animal welfare. However we believe that by housing our pigs indoors we are able to cater for their needs and care for them properly, to such an extent that we believe that we achieve better animal welfare outcomes than most outdoor pig producers.</p>	Noted
298	<p>Firstly, the Code is well written. It generally presents measured, objective, scientifically-based criteria for enhancing the well being of pigs. I am concerned that many of the submissions to the Committee will stem from the misleading but very effective anti-pig-farming publicity that has coincided with the opening of the draft to public comment. My concerns are expressed in the accompanying document (Pigs, Pig farming and the Anti-pig-farming Campaign) which was written for a friend who had been adversely influenced by the publicity. This document is not a formal part of this submission but I provide it for your information.</p>	Noted
299	<p>NZPork has significant concerns about five aspects of the Draft Code content and related draft economic analysis:</p> <ul style="list-style-type: none"> <li>• the proposed ban on the use of sow gestation stalls (Draft MS12(d));</li> <li>• the proposed ban on the use of stalls prior to mating (Draft MS12 (c) and (d));</li> </ul>	Noted

	<ul style="list-style-type: none"> <li>• the Draft Economic Analysis supporting a proposed date for banning the use of sow gestation stalls – currently proposed to be 2017;</li> <li>• the proposed increased space requirements for growing pigs (Draft MS6);</li> <li>• the practical limitations of the proposed limit on the use of farrowing crates to four weeks post farrowing (Draft MS11(d)).</li> </ul> <p>These proposals cannot be justified on the grounds of good practice and scientific knowledge. The proposals are contrary to the welfare of pigs and will have, or will potentially have, a negative impact on their welfare. The proposals are also contrary to the expert advice of the only independent expert body in New Zealand capable of advising on pig welfare – the Pig Veterinary Society, a special interest branch of the New Zealand Veterinary Association. The proposals appear to be driven by lack of knowledge of farming pigs and inattention to science and good practice. NAWAC has adopted approaches that will in most cases actually harm the pigs NAWAC is charged with protecting through the development of minimum welfare standards. NAWAC accepts there is no evidence that group housing can be preferred over the use of sow gestation stalls so has made its decision based on public opinion and whether it thinks the industry can afford to convert stalls to group housing. Both these considerations are contrary to the requirements of the Animal Welfare Act 1999 (“the Act”). NAWAC must make any decision based on good practice and scientific knowledge and any proposals must be the minimum necessary to ensure the welfare of pigs. NAWAC cannot simply choose any standards it wishes and then recommend their adoption just because it thinks (quite mistakenly) that the industry can afford to pay for them.</p> <p>When these changes are made, NZPork will support the Draft Code, and incorporate the code in its proactive work promoting animal welfare improvement. NZPork would welcome the opportunity to work with NAWAC on other matters identified in Section 7 (Drafting concerns with the Draft Code i.e. Minimum standards are sometimes vague and subjective; Inconsistencies and variations in the ‘example indicators’; Inconsistencies between codes of welfare of submission) relating more generally to codes of welfare.</p> <p>NZPork has previously advised NAWAC of concerns about the lawfulness of the Draft Code. This submission is confined to the substantive issues raised by the Draft Code. NZPork reserves its position in respect of legal concerns relating to the Draft Code.</p>	
300	<p>I am a New Zealander who supports differentiation of meat based on country of origin as I want to be able to eat New Zealand meat that I know has complied to a NZ Code of Animal Welfare and complies to our safety requirements. What I don’t understand is how we can have a code of welfare compliance requirement for NZ producers whilst imports do not have to meet the same requirements. Then, as there is no requirement to label meat by country of origin, how do I know what I am eating. It strikes me that this is ‘unfair trading’. All meat should be labelled by country of origin and all meat imported should meet the same production welfare standards. But at the end of the day no rules should exist for NZ production if imports don’t have to also comply to the same constraints.</p> <p>Science should override emotive animal rights positioning – let science, from the perspective of the animal, prevail.</p>	Noted
302	<p>I submit: That pigs have a guarantee through law to live a free range life, able to feed, forage and engage in natural pig behaviours.</p>	Noted

314	I appeal to you.. to ban the factory-farming of animals.	Noted
214 Emails sent to PM	Factory farmed pigs have suffered enough. Please support a ban on both sow and farrowing crates because the both break the law and are equally cruel. I am opposed to factory farming because...  [Additional personal messages were also added]	Noted
321 Green Party e-cards	Help me get out of this cage To David Carter, Minister of Agriculture: please phase out sow crates immediately as part of the review of the pig code. They are cruel and inhumane, and you have the power to get rid of them. [Additional personal messages could also be added]	Noted
14, 233 SAFE postcards, 4,232 emails and 205, 206, 268, 304, 308,	Dear Prime Minister, I seek your help to protect factory farmed pigs in New Zealand. As you are aware thousands of sows are cruelly confined in tiny stalls and farrowing crates which are in breach of the Animal Welfare Act 1999 (AWA). The pig code is under review however I lack confidence that the National Animal Welfare Advisory Committee (NAWAC) will phase out these appalling confinement systems despite widespread public opposition. This is my submission calling on NAWAC to a) uphold the principles of the AWA and b) ban sow stalls and farrowing crates immediately. Pigs have suffered for too many years. Prime Minister, please pass my submission on to NAWAC and I ask you to use your influence to ensure that pigs no longer have to endure these cruel confinement systems. Thank you.	Noted

Line Number	Section	Subsection	Submission No.	Comment	NAWAC response
	Title page				
9	1. Introduction	1.1	198	The Code at 1.1 states that there are several instances where matters are left to the judgment of the stockperson rather than being proscribed. This concerns me, given the animal welfare track record of the pork industry. Investigations by animal welfare groups have revealed appalling conditions on some pig farms, including untreated injuries, unnatural repetitive behaviours by confined pigs, and failure to properly dispose of deceased pigs. I think the New Zealand public would like more assurance that pig farmers' compliance with minimum standards of welfare will be monitored and enforced.	Noted
	2. Stockmanship	2 Intro.			

63		Intro	166	Success in any animal production system relies on providing the best care possible to the animals in our charge. This is particularly true in pork production where high levels of skill and stockmanship are paramount. Staff training is an important part of ensuring that all staff are aware of their responsibilities with regard to the welfare of the stock in their care. Staff are encouraged to take part in the AgITO management and ProHand courses and also to attend regular Tech Transfer seminars.	Noted
64		Intro	275	I absolutely endorse the theme presented in the current code and the reviewed draft - that it is the stock person who is critical in animal welfare, and his impact is more important than the effect of the management or housing system. However I, like many other pig farmers, have struggled over the years to find and keep good stock people. This most unfortunately is an ongoing concern, despite concerted effort. I would suggest that NAWAC may wish to support the New Zealand pork industry's need for skilled stockpersons to the Department of Immigration, as an effective way of contributing to the industry's capability to provide for welfare.	Noted
72		Intro	275	I cannot emphasise strongly enough the constraint of good stock people in caring for our animals — NZPork's submission details the investment it has made in training. Not only does the draft code recognise this, but it also explicitly recognizes the additional requirement associated with group housing. It specifically states that 'good stockmanship is particularly important.	Noted
72		Intro	299	The necessity for high standards of stockmanship was emphasised in the Draft Code released by NAWAC. The Draft Code states that "the achievement of high standards of animal welfare in any pig production system requires skill and good judgement. Unless pigs are managed and handled well, their welfare cannot be adequately protected. This code therefore stresses the importance of good stockmanship. There are several instances in this Code where matters are left to the judgement of the stockperson rather than being prescribed." Unlike pastoral agriculture pigs are totally reliant on farmers and farm staff to feed them. Skilled staff are essential to ensure that the feed is formulated, mixed and fed to the pigs. In June 2009 the Department of Immigration removed the Senior Stockperson, Farm Manager, and Stock/Herd Manager roles from the Immediate Skills Shortages List. This list is used to assess the suitability of	Noted

				immigration applicants to work in New Zealand. This decision was taken in the apparent belief that agricultural work is an unskilled occupation. Farmers have reported the continued difficulty in attracting and retaining staff and the difference that skilled stock people make to the productivity of a farm.	
75-85		Intro	178	The last two paragraphs should be RBPs. "Should", "is essential" and "are required to" all indicate this	Agree, wording changed in Introduction and RBP added
82		Intro	159	This should not be OR. Every person in contact with the pigs should have relevant, documented training.	Disagree
86		MS 1	84	I commend NAWAC for recommending adequate training for stock persons.	Noted
86		MS 1	108	Good stockmanship is vital.	Noted
86		MS 1	159	The actual minimum standard does not mention, for example BP4 yet this and some of the other indicators would seem critical to the welfare of the pigs. Why are these words not part of the actual MS? They should be the Standard, not just an indicator of compliance with the standard.	Disagree
86		MS 1	173	No change.	Noted
89		GI	159	This should be "required" not just encouraged.	Disagree
95	3. Food and Water		108	Food, water light and space to feed. As some pigs are very vicious and will worry and fight for food, or boredom.	Noted
	3.1 Feed General				
105			178	Change "...individual needs can..." to "...individual requirements can..." to avoid repetition	Agree, change made
113		Intro	178	"need to" = "should" here, and should be an RBP	Agree, change made
113		Intro	193	I agree that feeding systems for groups of pigs require good design and management. It is good that under the proposed code, owners or persons in charge of pigs are required to have a reliable source of feed and some reserves on hand in case supply or delivery fails.	Noted
115		MS 2	164	We do agree with and support the following parts of the draft code of welfare, that all pigs should have enough food, and a balanced diet to avoid competition and aggression but to be healthy and well fed.	Noted
115		MS 2 (a)	4, 5, 7-10, 14, 20, 21,	Current standards do not necessitate that pigs be fed enough to satisfy their appetites, because current standards do not require sufficient roughage or bulk. This is a key component in managing aggression,	Disagree, is an RBP



		23, 31, 33, 39, 43, 44, 47, 69, 71, 89, 95, 99, 107, 111, 114, 119, 128, 129, 131, 132, 143, 144, 155, 156, 165, 169, 170, 174, 176, 179, 184, 187, 191, 194, 197, 204, 207, 220, 222— 227, 229, 250, 252,	<p>which is central to the Code of Welfare for Pigs. Please amend Minimum Standard 2 to include a requirement that pigs must be fed in a manner that satisfies their appetite (in an appropriate manner that includes roughage or bulk).</p> <p>174: and that the food should be appropriate to the natural diet of pigs – fresh, varied, nutritious and tasty.</p>	
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			254, 302, 307,		
115		MS2 (a)	66	<p>While pigs are generally fed a diet that meets their nutritional needs, their diet often lacks sufficient roughage or bulk to satisfy the animals' appetite. This is a leading cause of aggression and unhappiness, especially in sows. Aggression is the main reason used by farmers to defend the use of sow stalls.</p> <p>The Green Party requests NAWAC to add that the pigs must be fed in a manner that satisfies their appetite.</p>	Disagree, is an RBP
115		MS2 (a)	153	<p>The current standards to not give pigs enough food to satisfy them. I think animals shouldn't be starved because I know what it's like to be hungry and pigs probably suffer 10x that amount. It would make them cross and angry to be kept so hungry. Please amend the standard to make it say that pigs need to be given enough food to satisfy their appetites.</p>	Disagree, is an RBP
115		MS2 (a)	173	<p>It is well established in the scientific literature that pigs need to be given food that not only satisfies them nutritionally, but also satisfies their appetite. Pigs that receive nutritionally adequate food but do not feel full, become aggressive and exhibit stereotype behaviour such as bar biting. In some sow stall systems where pigs are only fed infrequently, sows become so hungry that they work themselves into a frenzy when they see the stockperson arriving with the food. This over-excitement, followed by rapid bolting of food, has been found to be a causal factor in the fatal twisting of stomachs and spleens found in some sows.</p> <p>When images of bar biting, squealing pigs were shown on television, farmers and NAWAC dismissed public concerns over inhumane treatment by stating that the pigs were merely hungry. However this does not absolve them from blame; the question that needs to be asked is why the sows were allowed to become so hungry that they were gnawing at their bars, and why they were so bored all they had to look forward to was their next feed. Sows that are kept in environments where they can forage for their own food on the days they are not fed, and sows provided with straw and other manipulable material, do not show the same level of stereotype behaviour.</p> <p>References cited.</p> <p>Amend to read:</p> <p>All pigs in indoor housing must be fed every day. Pigs in outdoor housing</p>	Disagree, is an RBP

				<p>can be fed every two days, but only if they have provision to find their own food through foraging on the day they are not being fed. The food provided must enable each pig to:</p> <ul style="list-style-type: none"> <li>(i) Maintain good health</li> <li>(ii) Meet its physiological demands</li> <li>(iii) Avoid metabolic, nutritional and other disorders</li> <li>(iv) Satisfy the appetite of the pig. Adult and growing pigs must be given enough bulky feed or high-fibre feed to satisfy hunger.</li> </ul>	
115		MS2 (b)	173	<p>Amend to read: Feed must be provided in such a way as to prevent competition and injury. In individual housing, food must be presented to all pigs at the same time or as close together as possible, in order to prevent frenzies and stereotype behaviour.</p>	Disagree
115		MS 2 (c)	62	<p>Refers to the five point scale given as Appendix 1 to the Code. This scale is probably too coarse, given that 3 is considered normal while 2 is considered thin. More refined scales exist, e.g. see <a href="http://www.thepigsite.com/stockstds/23/body-condition-scoring">http://www.thepigsite.com/stockstds/23/body-condition-scoring</a> for Garth pigs. There needs to be intermediate measures, at least in the middle of the scale such as 2.5 so that under-nourishment is corrected earlier. The MS is unsuitable. The body condition categorized as level 2 of the 5-point scale is already indicative of the animal being under-nourished. Less than level 2 is indicative of severe under-nourishment such that the animal would be emaciated. How is it consistent with good pig welfare to allow it to become emaciated before requiring remedial action to be taken? Remedial action should be taken as soon as under-nourishment can be observed or felt (say at a body condition score of 2.5) for any type of pig.</p>	Disagree
115		MS 2 (c)	159	<p>This is too low! The SPCA would prosecute owners of dogs or cats with this amount of condition. The body condition should not fall below 4 on the scale of 1-5.</p>	Disagree
115		MS 2 (c)	173	<p>Amend to read: When the body condition of any pig falls to 3 or below, immediate remedial action must be taken to resolve the issue.</p>	Disagree
115		MS 2 (c)	204	<p>Why has the body condition of an animal at which remedial action must be taken has dropped from 2.5 (2005) to 2 (2009)?</p>	Disagree
115		MS 2	159	<p>Need to add: d) Feed must be of adequate quality and be free from bacterial contamination. (currently the minimum standard for feed does not cover a quality issue.</p>	Disagree, covered by MS 2(a)

115		MS 2	173	<p>The following sections should be added:</p> <p>(d) The food intake of pigs kept outdoors must account for possible wastage due to outdoor feeding and be adjusted according to weather conditions. Pigs kept outdoors must be fed in a suitable, well-drained feeding area.</p> <p>(e) Automatic feeding systems must be checked at least once every twelve hours to ensure they are in working order.</p> <p>(f) Owners or persons in charge of pigs must have a reliable source of feed and must have reserves available in case supply or delivery fails.</p>	Disagree, covered by MS 2(a)
116		Indicators	62	Reference to body condition 3.5 makes no sense when condition level 3.5 is not defined. See comment above about the need for additional levels to be defined.	Disagree
116		Indicators	159	<p>BP 6: Automatic feeding systems need to be checked at least <b>twice</b> in a 24 hr period especially given the notes provided in the document indicate that aggression is increased when food is not available.</p> <p>BP 7: What does minimised mean? Hard definitions need to be placed here so that MAF inspectors can monitor for animal cruelty. Everyone has a different interpretation on what minimise means.</p> <p>BP 8: The body weights for the different classes of pigs is also too low. Most scores are given as 2s or 3s.</p>	<p>Disagree</p> <p>Agree, change made</p> <p>Disagree</p>
116		Indicators	173	Some should be MS (see above)	Disagree
117		RBP	62	The best practices should be the minimum standards. If we know a better way to achieve the desired welfare outcomes these should be required rather than optional. The Code should require best practice rather than allow the minimum necessary. Thus, best practice would have the same legal status as the Code.	Disagree
120		RBP (b)	62	This should be a minimum requirement. Why should pigs be forced to feel hunger. They should always be given the amount and type of food they need to satisfy their hunger. This would likely have the additional benefit of decreasing aggression and the resultant injuries.	Disagree
120		RBP (b)	173, 204	Should be a minimum standard	Disagree
121		RBP (c)	62	This should also be a minimum requirement. Imagine being in a rest home or other circumstance in which you do not control your diet (other than by refusal to eat) and are given foods that upset your digestive system. Pigs should not have to suffer diet-induced stomach upsets any more than humans in care do.	Disagree

	3.2 Feed: Newborn piglets				
131		Intro	178	First sentence up to "...24 hours,..." is covered in MS 3(a) except for the 24 hours limit which should be an RBP.	Disagree
137-139		Intro	178	This is covered in MS 3(b) and (c).	Noted
141		MS 3	164	We do agree with and support the following parts of the draft code of welfare, that piglets should have enough colostrum and subsequent food, and orphans should be cared for and fostering of piglets is encouraged when necessary.	Noted
141		MS 3 (a)	173	Amend to read: All piglets must receive colostrum or an appropriate substitute within the first 12 hours of life.	Disagree, though wording changed
141		MS 3 (a)	204	Why do piglets must now receive colostrum or an appropriate substitute 'as soon as possible' rather than within 24 hours (2005 code)?	Agree, wording changed
142		Indicators	62	<i>BP 5:</i> Monitoring is a means of knowing whether the sow is producing enough milk for her piglets not whether all piglets are getting enough milk. There should be some measure of the nutritional welfare of the piglets.	Disagree
142		Indicators	159	<i>BP 1:</i> Very frequently words like "acceptable norms for the industry" are used to describe indicators for minimum standards. This is like getting a fox to guard the chicken house! In no circumstance should any industry be responsible for setting the standards by which it is required to adhere. <i>BP3:</i> How many do there need to be before being termed excessive? This type of language in the document needs to be removed and replaced by concrete language.	Agree, change made  Agree, change made
142		Indicators	178	<i>BP 1:</i> We reiterate our concern at the use of the terms 'acceptable' and 'acceptable to the industry'. Our understanding is that these should be NAWAC - as opposed to industry – standards, if NAWAC is to avoid laying itself open to criticism of capture. The information should be available in the code itself. <i>BP 3:</i> add "are apparent".	Agree, change made
142		Indicators	196	<i>BP 7:</i> Should be MS	Disagree
	3.3 Water				
153		MS 4	164	We do agree with and support the following parts of the draft code of welfare, that Pigs should have plenty of water which is clean and clear, with a back up supply in case it's needed.	Noted

153		MS 4 (a)	65	Common parlance, even by pig farmers, is that the term piglet includes post-weaned pigs. Since water availability is critical to the newly weaned pig it would be prudent to qualify the term used in the MS by using the descriptor "suckling" piglet.	Disagree, but wording changed
153		MS 4 (a)	173	Amend to read: An adequate daily supply of water that is palatable, not harmful to health and at a temperature that does not inhibit drinking must be accessible to all pigs and piglets.	Disagree, but wording changed
153		MS 4 (a)	204	Oppose the draft code's specific exclusion of piglets from the requirement to provide an adequate daily supply of water	Agree, wording changed
153		MS 4	173	Add: (c) Pigs on pasture must have ready access, at all times, to a water supply to make wallows. (d) The water supply for a piggery must be sufficient for the type of production system and number of pigs in the group, and the reserves must be adequate to cope with an average 24-hour demand. (e) Automatic watering systems must be checked at least twice every 12 hours to check they are in working order and must have a reliable alarm system in case of failure. (f) Alternative arrangements must be made available in case of equipment failure to ensure that pigs receive their daily water requirements. (g) The water delivery system must be at a height that is appropriate for the size of the animal it is supplying. For pigs kept outdoors adequate access to water troughs must be maintained.	Disagree  Disagree, but added to indicators  Disagree, but added to indicators  Disagree  Disagree
153		MS 4	204	Why has the requirement in the 2005 code for automatic watering systems to be checked every 24 hours to ensure they are in working order been removed?	Disagree, but added to indicators
154		Indicators BP 3	62	Again monitoring is a way of knowing but the essential indicators relevant to pig welfare should be that competition for water does not exceed a level which prevents any pig obtaining all the water it wants and that that water must at all times be clean. RBP (b) exemplifies a better way to express the need for monitoring because it specifies an outcome that the monitoring should achieve.	Agree, wording changed
154		Indicators	159	The language used to describe the examples of indicators for this standard are not prescriptive and therefore open to too much interpretation e.g "not vocalising unnecessarily", & "water reticulation system checked regularly". What do these mean? These words need to be replaced with concrete	Agree, wording changed

				words.	
160		GI	178	Suggest including the daily water requirements table from the current code as this would be useful information for new pig farmers.	Disagree
161	4. Shelter including Housing Facilities	Intro	108	Yes! These are appropriate	Noted
163		Intro.	178	Suggest change the first sentence to “Methods of pig production vary widely and include both indoor and outdoor systems”.	Agree, change made
166		Intro.	178	Is covered in MS 5 and 6.	Noted
	4.1 Shelter for Pigs Outdoors				
182		MS 5	164	We do agree with and support the following parts of the draft code of welfare, that All pigs should be provided with dry bedding, in a well insulated shelter which is draft free, ventilated and protective from extreme elements.	Noted
182		MS 5	173	No change	Noted
182		MS 5 (a)	178	Should be “draught” not “draft”.	Disagree
182		MS 5 (b)	62	Should be expanded to make it clear that it is the pigs who should be able to minimize the adverse effects <b>on their comfort and health</b> .	Disagree
182		MS 5	159	Under the actual minimum standard need to include: c) Clean bedding material must be provided and changed daily to minimise disease and maintain the insulating function of the bedding. I note that “equipment” is not included in the standard for outdoor pigs. Why not?	Disagree  Disagree
182		MS 5	163	I suggest the following minimum requirements for pig accommodation. All pigs shall be contained within paddocks of sufficient size that the drainage and vegetation recovery can maintain at least 50% of the area as dry under foot. The paddocks shall contain at least one shed with an open side facing away from the prevailing frontal weather, and is of sufficient size to provide shelter to all the pigs contained in the paddock. The shed shall be maintained with dry straw, clean water and supplementary feed. All pigs shall have free access to the shed, day and night. The paddock shall be maintained with a variety of vegetation including established trees that provide partial shade over at least 20% of its area.	Disagree  Disagree  Disagree Disagree

183		Indicators	65	<i>BP 4:</i> During wet weather or when there is snow on the ground sows in an outdoor piggery will rapidly wet their bedding material. This becomes critical in farrowing arks where the dampness can lead to chilling of the suckling piglets. Reference to appropriate bedding material should include the descriptors "clean and dry".	Disagree
183		Indicators	159	<i>BP 5:</i> Define what the minimal signs of cold or heat stress look like (language use again)	Disagree
183		Indicators	178	<i>BP 5:</i> Include "are apparent" between "stress" and "in pigs".	Disagree, though wording changed
	4.2 Housing and Equipment				
204-210		Intro	178	Only the first sentence should be here. The rest are all either covered under Minimum Standards or should be RBPs.	Disagree
205		Intro	159	It seems the housing requirements for indoor pigs wrt heating is less stringent than for outdoor pigs. Also "If the environment is not controlled during hot weather" piggeries should be temperature controlled for BOTH hot & cold weather.	Disagree
211		MS 6	61	The draft code is now outcome –based rather than a prescriptive code , which could well see animals being kept in even more cramped conditions than they already are. I fail to see how NAWAC 'S thinking of relying in good stockmanship , will work in favour of the well being of the pig. (which makes the removal of specified stocking densities that determine the number of pigs reared inside per (fattening ) pen very scary and a total retrograde step in pig welfare).	Noted
211		MS 6	164	We do agree with and support the following parts of the draft code of welfare, that All pigs at all times should have enough space in their houses, which are designed well, hygienic, well ventilated and/or heated, with freedom to move and lie down, free from contamination of food from dung, with good light, no toxic materials and free from hazards.	Noted
211		MS 6	173	The name of this Standard should be amended to "group housing and equipment". This will serve to differentiate it from the Standards for sow stalls and farrowing crates, which will still be allowed until 1 January 2013.	Disagree
211		MS 6	4, 5–10, 14, 20, 23, 31, 33, 39,	In order for pigs to express their natural behaviour, pigs need straw or other bedding to allow them to forage and root. Further, bedding provides pigs with greater comfort. Please amend this standard to include a requirement of sufficient straw or other bedding. (or other manipulable	Disagree, See also section 5 RBP (a) for manipulable material



		43, 44, 47, 69, 71, 80, 89, 95, 99, 101, 107, 111, 114, 115, 119, 128, 129, 131, 132, 143, 144, 155, 156, 158, 165, 169, 170, 174, 176, 184, 187, 191, 194, 197, 207, 220, 222— 227, 229, 250, 252, 254,	material to enable them to express their need to root and forage, and to lie down comfortably). 174: and is regularly replenished, especially when wet or soiled.	
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			302, 307,		
211		MS 6	12	I would like to see, the code ensure that all pigs are provided with sufficient straw or other manipulable material to enable them to express their need to root and forage, and to lie down comfortably.	Disagree, See also section 5 RBP (a) for manipulable material
211		MS 6	62	Also, this section on housing lacks any reference to the provision of bedding material. A further minimum standard requiring the provision of clean straw or other bedding material to all pigs should be added.	Disagree
211		MS 6	66	Pigs require straw or other bedding to enable them to express their natural needs to forage and root. It also provides comfort when they lie down. Many factory farmed pigs are kept on bare concrete floors. The Green Party calls on NAWAC to ensure that all pigs are provided with sufficient straw or other movable material to enable them to express their need to root and forage, and to lie down comfortably.	Disagree, See also section 5 RBP (a) for manipulable material
211		MS 6	72	Pigs must be allowed access to bedding such as straw.	Disagree
211		MS 6	134	No requirements have been mentioned with regards to bedding material and flooring conditions, it is unacceptable for bedding areas to just be concrete or slatted floors.	Disagree
211		MS 6	152	I think pigs should have good bedding because it is important that pigs feel comfortable. Straw should be put on the ground so pigs can be more comfortable. The straw should d be changed regularly to keep it nice and fresh.	Disagree
211		MS 6	159	The equipment part should be separated out from the housing.	Disagree
211		MS 6	163	I suggest the following minimum requirements for pig accommodation. All pigs shall be contained within paddocks of sufficient size that the drainage and vegetation recovery can maintain at least 50% of the area as dry under foot. (see further suggestions under MS 5)	Disagree
211		MS 6	173	SAFE also considers that pigs must be provided with straw for bedding and manipulation, to prevent aggression and stereotype behaviours. There should also be a requirement that unfamiliar pigs are not mixed in group housing, as this also increases aggression.	Disagree, See also section 5 RBP (a) for manipulable material and MS 9 for mixing of pigs
211		MS 6	193	I agree that pigs of all ages need to be provided with a dry, warm lying area with protection from excessive heat, cold and climatic extremes. But this part of the code should go on further and require that these lying areas have comfortable bedding such as straw and that they provide enough	Disagree, though MS added on space requirements

				<p>room for the pigs to turn around, stretch out and get comfortable. The environment in which pigs live is a very important contributor to the welfare of pigs. The environment that pigs live in is effected by things like stocking density/the amount of space available to each pig, the variety of space available to each pig and the quality of this space. Environment also concerns the air quality and amount of light.</p> <p>Minimum standards affecting pigs' living environment, such as those governing the amount of space available to each pig, need to make sure the physical and psychological needs of pigs are met. For example by making sure pigs have enough space to keep out of each other's way, with areas where they can hide from and avoid each other so as to decrease aggression and the opportunities for fighting. Having a large and varied space gives pigs the option to explore and run around so they won't be frustrated by being too confined.</p>	
211		MS 6	219	Why can't pig farmers at least provide straw for pigs to lie on instead of cold concrete?	Disagree
211		MS 6	310	There is also nothing in the code about improving the lives of those sows, boars and piglets kept in barren concrete pens – they need more space, bedding material and environmental enrichment, especially in the case of piglets who would in the wild be running, playing, exploring and learning how to find food and social skills.	Disagree
211		MS 6 (b)	134	<p>Does not set out an acceptable recommendation for measuring what size densities are required for pigs to be able to live successfully in group housing. Human opinion and expectations are widely varied and the code opens the standard up for debate when dealing with acceptable conditions.</p> <p>Alternatives are free range and Indoor generous group housing for growing/fattening pigs. Each growing pig needs to have enough room to move around freely with other pigs in the group, they should have freedom to move away from more dominant pigs without having to interfere with others. Pigs will gather in small social groups but clear space should be available for pigs to run around together. A separate feeding and dunging area must be available away from where the pigs lie down and socialize, access to bedding with suitable substrate to lie on must be available at all times. Indoor housing should be sloping with straw and other foraging ground materials for pigs to perform natural rooting, exploring behaviours. Pigs raised in barren environments such as slatted floors are profoundly</p>	Noted

				under stimulated. The lack of substrate for expression of exploratory behaviour is believed to contribute to behaviours redirected to pen mates, such as tail biting. Ideally, an outdoor access should be available for pigs during daylight hours. Responsible stockmanship is the key to successful group housing for fattening pigs. Expert management of straw based pens are extremely important to prevent respiratory problems and disease.	
211		MS 6 (b)	138	The minimum area allowed for indoor group housed pigs, which merely requires sufficient overall space to accommodate all the pigs lying on their sides, is inadequate and does not comply with ss 10 or 29(a). This should be reconsidered by the Committee.	Disagree, though MS added
211		MS 6 (b)	178	The only reference to space in MS 6 is the statement in 6(b). However, in the GI on P 14, 2nd paragraph, the given formula is described as "minimum". If it truly a minimum, we suggest it should be in the MS.	Disagree, though MS added
211		MS 6 (b)	190	In the current Code, the minimum space allowance for growing pigs is defined objectively in Minimum Standard 5 (a) as $K \times \text{liveweight}^{0.67} \text{ (kg)}$ where $K = 0.03$ . In the draft Code the minimum space allowance is subjectively defined in Minimum Standard 6(b) The only objective description of this space is given in General Information on page 14. In the absence of an objective minimum standard, the formula in General Information is likely to be assumed to be the minimum standard. I do not believe there is any justification (on welfare grounds) to increase the K value from 0.03 to 0.033 in the draft Code, as I am not aware of any instances I have encountered where a minimum space allowance defined by $K = 0.03$ has compromised the welfare of the pigs housed.	Agree. Formula for growing pigs has been included as a minimum standard as $K = 0.03$ .
211		MS 6 (b)	251	We accept that in the Industry there is an increased need to enlarge some facilities where insufficient space currently is not provided for sows to move about in appropriate housing conditions. In these regards, we are supportive of the proposed changes in the Code, given that there is an appropriate timeframe in which the improvements can be implemented.	Noted
211		MS 6 (c)	173	SAFE notes with approval the requirement that pigs be provided with a separate dunging area, as studies of pigs in natural conditions have indicated that they no more like to be smeared in their own excrement than we do. Pigs prefer to defecate at least five metres from their nesting area. In order for this to be achieved however, it is necessary that the space allowance be greater than that given by the Spoolder formula. SAFE recommends a space of at least $0.047 \times \text{body weight}^{2/3}$ per pig for growing pigs, not including the separate dunging area.	Disagree

				Amend to read: All pigs, including those in solitary confinement, must be provided with separate feeding and dunging areas. The dunging area shall be situated at least 5 metres from the feeding and nesting areas.	
211		MS 6 (f)	65	There should be reference to a daily light exposure periodicity. In indoor units lighting in weaner accommodation is often only turned on when staff are checking the pigs. This may be for less than 1 hour per day. Because pigs raised in the dark are less mobile than they would be in normally lit conditions, they grow faster; this work was done in Britain in the 1980's. However they also have less opportunity to investigate their surroundings or display normal social interactions. Earlier versions of the pig code required that pigs of all ages had lighting that mimicked day and night periodicity.	Agree, change made
211		MS 6 (f)	107	While I support a standard regarding a minimum amount of light, 20 lux is a very low level. Pigs need light; to deny them a minimum amount of sunshine and natural light, as well as general adequate lighting (artificial or natural), is to neglect their psychological needs.	Disagree, though added as BP 5
211		MS 6 (f)	115	There should definitely be a standard regarding the amount of light. This should certainly exceed 20 lux.	Disagree, though added as BP
211		MS 6 (f)	138	The lighting requirements are inadequate and also fail to comply with ss 10 & 29(a). There is evidence that the proposed minimum light level of 20 lux is too low for adequate pig welfare. Furthermore, the requirement in the current Code that light be available for a minimum of 9 hours a day is gone. The minimum standard should require all pigs to be provided with natural or artificial light equivalent to normal daylight hours and intensity.	Disagree  Agree, change made
211		MS 6 (f)	173	Amend to read: Pigs must be provided with natural light or artificial light that is equivalent to normal daylight hours and intensity.	Disagree, though wording changed
211		MS 6 (f)	179	The 2010 RSPCA welfare standards for pigs state that "in each period of 24 hours, housed pigs must have access to an area that provides a period of at least eight hours continuous light with a minimum intensity of 50 lux." NAWAC's draft code is also completely out of step with 2001 EU legislation which requires at least 40 lux for eight hours. Very recent research confirms that "pigs have a specific requirement in terms of environmental lighting, i.e. photophase duration and light intensity" and	Agree, change made  Disagree, though outcome based MS for lighting included

				that "pigs show a better welfare level when they receive the higher (40 vs. 20 lux and 80 vs. 40 lux) light intensities". In view of accepted practice in other countries and recent research, the minimum lighting requirement should be raised to at least 40 lux for eight hours per day.	
211		MS 6 (f)	196	We believe that all pigs must have access to natural light every day. We are not opposing some artificial light but we completely oppose a lack of any natural light. Just as humans have the option of living in environments with both natural and artificial light we believe pigs deserve that same right.	Disagree
211		MS 6 (f)	204	Why is there is no longer a specification of a minimum daily duration of 20 lux light as there was (9 hours) in 2005?	Agree, change made
211		MS 6	173	<p>Add to this Standard:</p> <p>(k) Minimum space for growing pigs in group housing (not including the separate dunging area) shall be calculated using the following formula: Space in square metres = <math>0.047 \times \text{body weight (in kg)}^{2/3}</math>.</p> <p>(l) The minimum space for sows in group housing shall be 3.6 square metres per sow, not including the separate dunging area.</p> <p>(m) Sleeping areas must be of sufficient size to accommodate all the pigs lying comfortably on their sides without sharing space.</p> <p>(n) Pigs shall be provided with sufficient straw or other manipulable material to enable them to express their need to root and forage, and to lie down comfortably.</p> <p>(o) Unfamiliar pigs must not be mixed in group housing.</p> <p>(p) Pigs shall be kept in solitary confinement as a last resort only. Pigs in solitary confinement must be able to turn around comfortably.</p> <p>(q) All pigs must be inspected daily by persons qualified in accordance with Minimum Standard 1. Immediate and remedial action must be taken if any injuries, discomfort or signs of stress are observed.</p>	<p>Disagree, though MS added</p> <p>Disagree</p> <p>Disagree</p> <p>Disagree, See also section 5 RBP (a)</p> <p>Disagree</p> <p>Disagree</p> <p>Disagree</p>
211		MS 6	196	We believe that there should be a Minimum Standard that makes slatted or perforated floors completely unacceptable and that concrete floors should only be permissible if they are covered in a very deep layer of something natural. E.g. sawdust, woodchip, straw, etc.	Disagree
211		MS 6	204	Why is there is no longer a requirement for an alarm to warn of any ventilation system breakdown?	Disagree
211		MS 6	275	The way that space requirements are covered in the draft code is of great concern to sectors of the industry, as although set in general information rather than a minimum standard, in the absence of any other specific	Disagree, though change made

				standard, this will become the default position. In effect the requirement is for a 10% increase in space.	
212		Indicators	62	Again, some example indicators are not effects based, e.g. <i>BP 2</i> lacks any measure by which to objectively assess aggression. Similarly, <i>BP 7</i> should be that temperature and ventilation are maintained within some range relevant to pig well-being. This will necessitate staff knowing how to manage these things but them having this knowledge is not a suitable indicator – just a necessary step to achieve the welfare outcome.	Disagree Agree, change made
212		Indicators	62	Having 15% of animals suffering from wounding is much too high. This indicates a considerable level of aggression given that much aggression does not result in injury. A much lower level should be a minimum standard and it should be achieved by adequate feeding, mental stimulation and distraction and breed selection.	Agree, change made
212		Indicators	159	<i>BP 2</i> : Language again. What does “becomes problematic” mean wrt levels of aggressive behaviour? Define these words. <i>BP3</i> : 15% of what? Does NAWAC mean that only 15% of all fights result in wounds or 15% of wounds made by other causes or what? <i>BP 5</i> : replace Available for inspection to: is used to provide light for a minimum of x hours per day. <i>BP 9</i> : For what emergency? Power cuts? Roof falling in? all and any emergency? Define the words <i>BP13</i> : Pig distribution and behaviour monitored during <b>TWICE</b> daily inspections and corrective action to etc. or better still, excellent monitoring equipment can be purchased and installed at not a great deal of cost that will set off alarms if the temperature gets above or below specified temperature. This is common equipment in aquaculture facilities. The alarms should not replace manual monitoring, but would cover hours when staff are not present.	Agree, wording changed Agree, wording changed Disagree, but MS wording changed Noted  Disagree, though wording changed
212		Indicators	178	<i>BP 3</i> : We would be interested to know the basis for the figure of 15%. <i>BP 12</i> : Suggest “Pigs have no access to toxic hazards e.g. ...”. <i>BP 13</i> : Insert “are” between “behaviour” and “monitored” and “is” between “ventilation” and “taken”. <i>BP 14, 15, 16</i> : Similarly need to be made into sentences.	Noted Disagree, though wording changed  Agree, wording changed
217		GI	4	Given adequate space pigs do not foul their sleeping area. I request that the Draft Code be amended to provide internationally recognised	Disagree, though MS and RBP added and

				standards of space per pig.	wording changed
217		GI	62	Why is a minimum space allowed to be less than the area required for all pigs to lie down in simultaneously? At the very least, a minimum standard should be that all pigs can lie down without overlap simultaneously – otherwise it means some will have to lie partly on top of each other or they will have to take turns to lie down. Those options are not consistent with the need to provide space for ventilation nor with other well-being needs.	Disagree, though MS and RBP added and wording changed
217		GI	65	<p>Unless there is a significant reason, space allowance measurement recommendations should not differ significantly from those used in countries that export pig meat into New Zealand ie Australia, Canada, Europe and the USA. Using the Rossi et al formulae puts New Zealand pig farmers at a serious economic disadvantage by increasing the cost of producing pig meat.</p> <p>a) all of the exporting countries use the Spoolder formula ie ) <math>0.03 \times BW^{0.67}</math></p> <p>b) there is no scientific evidence that the greater space allowance inherent in using the Rossi formula provides significantly better welfare. Over the past twelve months I have spent a considerable amount of my time studying the effects of heat stress on pigs. Essentially pigs are not able to sweat and so evaporative cooling can only occur through 'insensible' water loss through the skin. The primary mechanism for cooling in the pig is through respiratory loss via the lungs and nasal mucosa; if required I have over 20 references to this.</p> <p>Unless pigs have access to a wet area to rest on, when over heated, pigs will position themselves in sternal recumbency and pant. Sternal recumbency is important because lung function is impaired through hypostatic congestion of the lower lobes of the lung when the pig is lying on its side. Consequently when ambient temperatures are high pigs will favour lying against walls or other objects (even other pigs) in an endeavour to attain optimal lung function.</p> <p>The recommendation for space allowance that gives all pigs the opportunity to lie on their sides without touching each other when ambient temperatures exceed 28oC</p> <p>a) shows no understanding of the pathophysiology of heat stress in pigs</p> <p>b) imposes unnecessary cost on New Zealand pig farmers making their economic viability less favourable in the face of imports.</p>	Disagree, though MS and RBP added and wording changed
217		GI	72	They must be provided space to move, to allow them to behave in a	Disagree



				natural manner.	
217		GI	134	Sizing depends on the amount of pigs housed in a group. More importantly the size must be large enough to let pigs in the group perform natural behaviours. Sizing should be SPCA approved and subjected to audits.	Disagree
217		GI	159	The space required for pigs is too small. Be ethical and set larger spaces for pigs!	Disagree
217		GI	173	<p>The draft Code of Welfare mentions the requirement for growing pigs to have a space in square metres of at least 0.033 multiplied by the two-thirds root of their body weight in kilograms. This is known as the Spoolder formula and was originally calculated as the minimum requirement for production efficiency, not for welfare. The minimum requirement for growing pigs to all lie comfortably together is 0.047 x the two-thirds root of the body weight, though the Scientific Veterinary Committee recommends that more space than this is required for social interaction.</p> <p>The space requirements of pregnant sows are greater than those of growing pigs. The Scientific Veterinary Committee cites a requirement of more than 2.27 square metres per sow in group housing to allow the development of a stable social system. For a 200kg pregnant sow, this equates to a space of 0.07 x body weight<sup>2/3</sup>. A later study monitored injury, aggression and time spent foraging in sows kept in group housing with different space allowances from 2-4.8 square metres per sow. Based on the results of this study, a space of between 2.4 and 3.6 square metres per sow was recommended.</p> <p>References cited in submission.</p>	<p>Noted</p> <p>Disagree</p>
217		GI	178	<p>The given formula is described as “minimum”. If it truly a minimum, we suggest it should be in the MS.</p> <p>We have some concerns in relation to this formula. When pigs are farmed, they are placed in a pen for as long as the system allows before they are moved to more spacious accommodation, group size is reduced, or they are sent to slaughter. The size of the pens on almost all farms is fixed, although pens differ in size. As the minimum space requirement must be provided at all times, and as the modern pig grows rapidly, for most of the time a pig is in a pen, the space allowance greatly exceeds the minimum requirement when the pigs are initially placed. This space allowance progressively decreases as the pigs grow to fill the pen, until such time as they are moved at, or before, the minimum space allowance is reached. The tendency in modern pig production is to reduce the number of moves</p>	Disagree, though MS and RBP added and wording changed

				<p>and mixes pigs undergo during grow-out, as these are now recognised to be the truly disruptive and stressful events that have a significant impact on their health, welfare and performance. Increased space allowance can only be managed by costly construction or by more closely matching the required space allowance with the weight of the pig i.e. moving them constantly. Further, too much space can be as bad for little pigs as too little, as this has a direct influence on the temperature of the building given basal ventilation rates. Using the formula of <math>K \times BW^{0.67}</math> where K is 0.03 to determine the minimum space pigs must have before they are moved means that in effect almost all pigs have more than <math>K = 0.034</math> space for most of the time. The literature suggests that there is little to be gained in performance and welfare with a K greater than 0.034, and generally this work is done where pigs are placed at <math>K = 0.034</math> rather than their having grown into the space. In summary, the space provided by <math>K = 0.03</math> is only reached or approached for a brief moment in time and only after the pigs have grown into the space together as a stable group. Under these circumstances it provides for adequate welfare. We believe that an increased space allowance will be counterproductive as it will encourage or necessitate farmers moving pigs more often and may lead to chilling of smaller pigs, especially during winter. We therefore support the application of the formula: Area (m<sup>2</sup>) per pig = <math>0.03 \times \text{liveweight}^{0.67}</math> (kg)</p>	
217		GI	190	<p>In the absence of an objective minimum standard, the formula in General Information is likely to be assumed to be the minimum standard. I do not believe there is any justification (on welfare grounds) to increase the K value from 0.03 to 0.033 in the draft Code, as I am not aware of any instances I have encountered where a minimum space allowance defined by <math>K = 0.03</math> has compromised the welfare of the pigs housed. This is because the minimum space allowance is only approached (or reached) at the very end of the period that a group of pigs has been in a pen, after which they are moved to larger pens or to slaughter. As the growing pigs are “growing”, obviously the space allowance is more generous at all times preceding this end point, and for the most part exceeds <math>K = 0.034</math>. Thus when the pigs are placed in the pen, the space allowance greatly exceeds the space allowance at the end point – by as much as 300% in some instances. How greatly the space allowance at placement exceeds that at the end point is directly related to how long the pigs are in the pen. It is the space allowance at placement that is importance to pig welfare as it is at</p>	Disagree, though MS and RBP added and wording changed

				<p>this time that pigs are often mixed as well as moved; both of which are events known to be disruptive and stressful and to impact on growth and health, as well as welfare.</p> <p>The move in modern pig production over the years has been to reduce the number of moves and mixes for these reasons. As a result, the space allowance at placement is considerable and at times even excessive i.e. with more space per pig, pigs become more susceptible to cold temperatures. Consequently, the K value for most weaner accommodation exceeds 0.08 at placement and in many cases is greater than 0.1. This is the space allowance that is important rather than that at the end point. By the time the pigs reach the minimum space allowance provided by the pen they are in, they have been growing progressively into that space as a stable group. The consequences of this space allowance and its influence on the pig's welfare is very different to that were the same space allowance to be provided when the pigs are placed. Thus while research suggests space has an impact on welfare where K is below 0.034, in practice pigs show no such affects when less space is available for a limited amount of time after a period of progressive acclimatisation.</p> <p>Without increasing the size of the pens or reducing the number of pigs per pen, both of which are not viable options for most farmers, those farms where the space at the end point is less than <math>K = 0.033</math> will only be able to meet this space requirement by moving pigs more often, thereby better matching the liveweight of the group with the pen size. This will have a real and significant negative impact on pig welfare that greatly outweighs the consequences of pigs housed at <math>K = 0.03</math> in a stable social group. If NAWAC increase the minimum space allowance from <math>K = 0.03</math> to <math>K = 0.033</math>, they are likely to decrease rather than improve pig welfare, which I am sure is not their intention. That NAWAC have proposed an increased minimum space allowance in the draft Code suggests its members do not yet fully understand the basic dynamics of modern pig farming.</p> <p>I am concerned that the minimum space allowance is not clearly defined in Minimum Standard 6 and strongly recommend that NAWAC include the sentence "The minimum space allowance for growing pigs can be calculated by the formula: Area (m<sup>2</sup>) per pig = <math>0.03 \times \text{liveweight}^{0.67}</math> (kg)" in that standard. The suggestion that the space allowance should increase to <math>K = 0.047</math> when the temperature is over 25°C in the General Information on page 14 is of considerable concern to me and suggests a</p>	
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				lack of understanding of pig behaviour. The K value of 0.047 is proposed as it is claimed to be that which allows all pigs to lie in lateral recumbency without touching one another. Firstly, this K value, which was originally calculated by Petherwick and Baxter (1982) has been shown to be incorrect and the value of 0.041 has since been adopted by the EU Scientific Veterinary Committee (report 30 September 1997). Secondly, application of the formula is only relevant were pigs to choose to lie in lateral recumbency without touching one another when they are hot. This they simply don't do, so the suggestion that pigs be given more space above 250C is a nonsense.	
217		GI	196	We believe this an unacceptably small area for a growing pig. The minimum area for a growing pig must allow the pig to run, play and exercise in such a way that promotes good health in a pig. Just as humans are prone to ill health through lack of exercise and play, so are pigs. We believe the minimum area should be at least triple that currently proposed.	Disagree
217		GI	211	FreshPork Farms Ltd wishes to challenge the proposed change from a "k" factor of 0.030 to 0.033. While FreshPork Ltd uses a "k" factor of 0.033 in its production management we do not believe that it should be the minimum standard. We know that there are farms that have spent a lot of money on fully slatted floors, fan ventilation and water cooling mechanisms that would be considerably disadvantaged if their carrying capacity was reduced by 10%. Given that the industry is adopting the AsureQuality Pig Care Animal Welfare Accreditation programme we feel that auditors should be giving farmers the appropriate "k" factor for their farm where it is required to be above 0.030. The other aspect to this debate is that growing pigs do not spend their whole life at the limit of the space allowance defined by the "k" factor. Typically this only happens for a week or less, just before animals are either sold or moved due to the fast growth rate of a pig.	Disagree, though MS and RBP added and wording changed
217		GI	272	The minimum space allowances recommended by Spoodler et al from his research in 2000 (Area m2 per pig = 0.03 x liveweight 0.67 (kg)) is well recognized internationally as the accepted space allowances for growing pigs. The minimum space allowances only really become applicable in the last week or so of their time in the grower shed. Prior to that the grower pigs have a lot more space than the minimum requirements. PIC requests that the minimum space allowances recommended by Spoodler et al be retained.	Disagree, though MS and RBP added and wording changed

217		GI	273	In terms of space requirements for growing pigs, there are huge differences between well designed new sheds and the space that is needed for older less comfortable housing. The judgement of what is good for the pig depends on how the pigs look. Are they dirty, are they growing well, is there tail biting, a large range of size, evidence of fighting, are they sleeping on top of each other? These are much more relevant than the actual pen size. If pigs are comfortable in a given space, they will have good outcomes for the farmer. If the pigs are not given adequate space or adequate environmental conditions then they will not perform well.	Noted
217		GI	274	Federated Farmers submits that we are supportive of farm management practices that ensure good animal welfare practices. It appears that the point of contention for the Pig Code is minimum space requirements. As an organisation we are not technical experts on this matter. However, based on our knowledge we are concerned that NAWAC are proposing that minimum space requirements are increased.	Noted
217		GI	275	In effect the requirement is for a 10% increase in space. Such an approach is at odds with how production systems operate in practice. No justification is provided for this proposal. Furthermore, as I understand it, NAWAC had intended to revert to the standard of the 2005 code, after NZPork's submission on the preconsultation draft, but has mistakenly included a greater constant in the formula. Critically, no economic impact has been assessed, and no transition is associated with this proposal which will effectively hit indoor farms a double blow.	Disagree, though MS and RBP added and wording changed
217		GI	299	Delete and replace with: The minimum space allowance for growing pigs can be calculated by the following formula: $\text{Area (m}^2\text{) per pig} = 0.030 \times \text{liveweight}^{0.67} \text{ (kg)}$ . The proposed increased space requirements for growing pigs cannot be justified in terms of good practice and scientific knowledge. The existing space requirements in the 2005 Code of Welfare have been set on the basis of the research by Spoolder et al., (2000). That research compared the welfare effects of the EU space requirements with a formula (subsequently adopted in the 2005 Code of Welfare for New Zealand) and has not been superseded by any new research on the welfare effects of minimum space requirements. The effect of the proposed increased space requirements will most likely be to increase the number of shifts for growing pigs and thus increase the welfare concerns that can arise from such shifts including inadequate cleaning and disinfection of pens between	Disagree, though MS and RBP added and wording changed

				<p>moves, stress on the pigs associated with moving pens and making disease control more challenging. NAWAC has provided no evidence that the current space requirements are creating welfare concerns and the proposed space requirements will clearly not be the minimum necessary as required by the Act. Furthermore, NAWAC appears to have misunderstood that farmers often operate at space levels above the minima, due to the interaction of building design, feed systems, group sizes, bedding and ventilation for most of the growing cycle. Regardless, pigs will only approach the minimum space per pen for a short period of time before they are transferred.</p> <p>Most notably, NAWAC has not even considered the financial impact of this proposal, which would be additive to the financial and economic impact of proposals regarding sow stalls.</p> <p>(more details in full submission).</p>	
219		GI	178	<p>Reference to the NZPork website. Our understanding is that these should be NAWAC - as opposed to industry – standards, if NAWAC is to avoid laying itself open to criticism of capture. The information should be available in the code itself.</p>	Disagree, though wording changed
220		GI	175	<p>I see no reason to increase the space allowance for growing pigs by 42% in warm weather, for 2 reasons;</p> <p>a) It is impractical. In Canterbury we can go from having a day in the early 30's and plummet to 5oC in the space of 4-5 hours or in the evening. Are you suggesting when it is hot we should remove some of the growing pigs to another pen, then when evening comes or a cool change, we should then reintroduce these pigs to the original pen to enable them to keep warm. This is would add a huge amount of extra handling of the stock (added stress) as well as cleaning.</p> <p>b) Our sheds can reach temperatures as high as 28 or 29oC on the extreme days during summer. Even at these temperatures we do not see increased morbidity or mortality, nor do we see a decrease in finished carcass weight or experience any out breaks in disease as a result, which is a clear indication that these pigs are not unduly suffering. Therefore I do not see and justification for this requirement for additional space on welfare grounds.</p> <p>If we were to increase grower space by 42% it would cost in excess of \$300K in capital expenditure, and would only be required to be used for 3 months of the year. This is an unsustainable cost for housing and would</p>	Disagree, though MS and RBP added and wording changed

				put us at a severe disadvantage against imported product.	
220		GI	178	Another issue of concern is the suggestion that the space allowance should increase to $K=0.047$ when the temperature is over 25°C. This K value is proposed as it is that which allows all pigs to lie in lateral recumbency without touching one another on the assumption that when it is hot pigs will assume this posture to maximise the opportunity for heat loss. Firstly, the K value of 0.047 is derived from work by Petherwick from 1981. This was repeated in 2006 , when the K value was established repeated as 0.041. Secondly, pigs do not choose to spread out and lie in lateral recumbency when they are hot, but rather continue to maintain body contact with pen mates, often lying virtually on top of each other. Furthermore, the pig relies heavily on respiration when hot and lateral recumbency is not a position they adopt when “panting” because the lower lung lobes' function is impaired by hypostatic congestion. We therefore do not support the suggestion that a K value of 0.047 should be applied at temperatures greater than 25 degrees.	Disagree, though MS and RBP added and wording changed
220		GI	211	We totally reject the suggestion of a “k” factor of 0.047 during hot weather. The Draft Code (2010) infers that all pigs in hot weather lie in a laterally recumbent position. Personal experience does not support that statement and neither does research. Edwards et al (1988) state that ‘even in a warm environment all pigs in a group do not lie fully recumbent simultaneously and considerable unoccupied space results”.	Disagree, though MS and RBP added and wording changed
220		GI	262	The code is implying the need 2 reduce stocking densities in the event of temperatures exceeding 25 degrees? Is this practicable or welfare beneficial? Are you requiring us to take a couple of pigs out of pens and create the significant stress on them of mixing? In a deep litter situation will the bedding need to be removed on hot days which is generating a large amount of heat? In a well ventilated 25 degrees is not an excessive temperature.	Disagree, though MS and RBP added and wording changed
220		GI	263	The proposed changes to space allocation due to high temperatures is akin to making all road speed limits to 50kms/hr to lower the road toll. This is neither backed by scientific research nor is it practical. Due to the high standard of insulation and sensitive electronic controlling of room temperatures on most hot days the room temperatures can be 4-5 degrees lower than outside due to the effects of high air movements from the ventilation equipment akin to standing under a tree with a breeze blowing through.	Disagree, though MS and RBP added and wording changed

220		GI	272	<p>This represents a 57 % increase in the space allowance required in the current Welfare Code. From a practical viewpoint we fail to see how any pig producer will maintain grower accommodation well in excess of the standard requirements just in case the shed temperature gets too hot for a few hours on a few days a year. NZ has a temperate climate and the number of times the grower buildings internal temperature would cause any heat stress would be the exception rather than the rule. Furthermore it is absurd to suggest that when temperatures exceed 25°C you have to increase the space required. Weaner pigs from 6 – 25 kgs are required to have a temperature range of 21 – 30 °C (refer table 7 of 2005 Welfare Code) depending on their bodyweight (i.e.) the lower the weight the higher temperature required. Indoor piggeries have good means of insulation and ventilation to provide the optimum temperature requirements for pigs. PIC requests that this additional space requirement for periods of hot temperatures be deleted from the Draft Code.</p>	Disagree, though MS and RBP added and wording changed
220		GI	275	<p>This is exacerbated by a considerably increased requirement at higher temperatures. Such an approach is at odds with how production systems operate in practice.</p>	Disagree, though MS and RBP added and wording changed
220		GI	299	<p>Similarly, the proposed increased space requirements for growing pigs in hot temperatures suffer from all the same deficiencies as noted above. NAWAC has not identified any concerns with the operation of the current space requirements. The research by Spoolder et al., (2000) is directly applicable to higher temperatures in New Zealand as the research was undertaken in temperatures up to 25°C and the mean daily maximum air temperatures in all regions in New Zealand do not exceed that temperature. The proposed space requirement will not be the minimum necessary. Most notably, NAWAC has not even considered the financial impact of this proposal, which would be additive to the financial and economic impact of proposals regarding sow stalls.</p> <p>Delete paragraph and replace with: In practice total space per pig varies, depending on the interaction of a number of factors characterising the housing and management system. These include feeding strategies, feed type, group size, age, breed, temperature, insulation, ventilation, pen shape, flooring, lighting and other husbandry factors. These matters cannot be looked at in isolation because the overall building design and operation reflects the interaction of a wide range of variables. This is demonstrated by considering two housing systems at either end of the</p>	Disagree, though MS and RBP added and wording changed



				spectrum. For example, in well insulated environmentally controlled facilities, as temperature increases, the ventilation system increases the volume of air moved through the facility to remove excess heat, and cooling systems may come into play. In contrast, in an open fronted bedded system, when it is cold the pigs will huddle together into the straw under the kennel roof to keep warm, and will tend to spread out over a larger area when temperature rises.	
225		GI	178	Reference to the NZPork website. Our understanding is that these should be NAWAC - as opposed to industry – standards, if NAWAC is to avoid laying itself open to criticism of capture. The information should be available in the code itself.	Disagree, though wording changed
230		GI	159	There is reference to deep litter systems that seems to imply that these systems don't have a dung area? If this is currently true, then a dung area is crucial as use of a dung area is part of a pigs normal behaviour and absence of one is an infringement of the animal welfare act.	Disagree
230		GI	206	This is effectively an increase of 10% on current space allowances. This would have major impact on our farm by either reducing the size of the piggery by 10% or increasing the physical area by 10%. Given the economic times of farming and the future uncertainty of other external pressures placed on pork producers the cost of making on farm changes would make us look closely at the viability of the venture.	Disagree, though MS and RBP added and wording changed
230		GI	261	I am also concerned about the proposal to increase minimum space requirements by 10%, utilising a constant in the space formula of 0.033, rather than 0.03. My understanding is that the 0.030 constant was established by research that essentially maintained space at this level throughout the growing cycle. In contrast, my grower pigs move 3 times, into larger pens so that in practice they are only close to this minimum space for a short time throughout their growing cycle. At present this is not a constraint. However it limits my potential to move to heavier weight pigs, another productivity gain (currently selling 63 kgs average weight).	Disagree, though MS and RBP added and wording changed
	4.2.1 Temperature				
242		MS 7	164	We do agree with and support the following parts of the draft code of welfare, that Piglets should be kept warm when they are little and be checked for normal behavior and health more than once a day (the draft says once a day).	Noted Agree Disagree
242		MS 7 (a)	159	Clearly we know what temperature piglets require (on P 15 it gives links to	Disagree

				a website for these figures) so actually state the number in the standard. This way temp controllers can be set to this and inspectors can monitor for compliance.	
242		MS 7 (c)	108	When from overheating they will die, esp. if worry and fight for food or boredom.	Disagree
242		MS 7 (c)	134	Deep litter systems already used in NZ are naturally ventilated, with a base of rice, hull and/or straw. They are more environmentally sustainable as liquid effluent systems are not necessary.	Noted
242		MS 7	173	Reword as follows: (a) Provision must be made to maintain an appropriate temperature range for all pigs. (b) All pigs must be protected from wide or abrupt temperature fluctuations within any 24-hour period. (c) Pigs must not suffer heat stress. Intensively confined pigs must be cooled using appropriate cooling devices when internal house temperature and humidity are high. Pigs kept outdoors must have access to shade and must be able to construct wallows. (d) Heating devices (e.g., infra red lamps, heat pads) must be securely fixed and protected from interference by the sow and piglets.	Disagree  Disagree  Disagree, though MS added  Disagree
250		GI	178	Reference to the NZPork website. Our understanding is that these should be NAWAC - as opposed to industry – standards, if NAWAC is to avoid laying itself open to criticism of capture. The information should be available in the code itself.	Disagree, though wording changed
	4.2.2 Air quality				
253		Intro.	178	Given that air quality could be good or bad, perhaps the first sentence should begin “Control of air quality...”.	Agree, change made
258		MS 8 (b)	62	25ppm is a level that humans find uncomfortable, with extended exposure possibly being harmful, yet the Code proposes allowing up to this level as a minimum standard (i.e. must not exceed this level) for pigs. What evidence is there that pig comfort is okay up to this level? Levels that lead to bodily irritation are probably well above the level that leads to discomfort (it would be a very poorly evolved sensory system that didn't give warning before an injurious level was experienced). The level should be set at one which prevents discomfort being experienced by the pigs, recognizing that they are not free to remove themselves from the situation.	Disagree
258		MS 8 (b)	159	25ppm is too high It should be the same as for humans ie 15ppm . What evidence do NAWAC have to say pigs do not suffer the same effects from	Disagree

				ammonia as humans? The welfare act is meant to up hold standards for health.	
258		MS 8 (b)	173	Amend to read: All pig housing must be inspected daily by persons qualified in accordance with Minimum Standard 1. Immediate and remedial action must be taken if ammonia levels exceed 25ppm within the housing facility, or if humidity dust or ammonia levels (as detected by smell) are unpleasant to the stockperson conducting the inspection.	Disagree
259		Indicators	173	Include as MS	Disagree
259		Indicators	178	<i>BP 1:</i> remove "that". <i>BP 2:</i> add "are apparent".	Agree, change made Disagree but wording changed
268		GI	178	Suggest the second paragraph be an RBP	Disagree, covered by MS
271		GI	159	So BAN this type of housing. Put it in the code!	Disagree
271		GI	196	This practice is absolutely disgusting and unacceptable. We believe it should be banned immediately	Disagree
	5. Behaviour				
273			108	Anyone who manages and animal or bird should ensure all the facts you have in this Section are correct. Plus music played quietly through the stys, until late evening	Disagree
274		Intro	35	May I enquire if anyone has actually listed what repertoire pigs in their natural state are allowed to have? How does domestication of pigs change the "repertoire" available, from walking around lying down in the grass, and feeding a litter, to being caged up with no room to even turn around and feeding your young through iron bars? Is that considered domestication? Where does the phrase husbandry of animals come into the picture? Delete husbandry and exchange torture.	Disagree
287		Intro	196	Sow stalls and Farrowing crates are an absolutely unacceptable, inhumane ways of managing pigs. We ask for these to be banned immediately. Encouraging new management practices and continuous improvement is a cop out which allows this inhumane practice to continue. NAWAC's saying they encourage this means absolutely nothing to someone who doesn't care about pig welfare. NAWAC must make a stand and demand an end to this cruelty. We accept that most sows are extremely protective of their piglets and	Disagree

				some can become aggressive as a result. However, this should not be seen as an excuse to restrict their freedom. Space and freedom are just as important to pigs as they are to humans. We don't believe there are no alternatives available. If the alternative is to have less stock then that should be the standard practice. Sow stalls and Farrowing crates are NOT for the protection of sows or piglets. Their sole purpose is to protect the farmer's income.	
288		Intro	178	Suggest replace "in so doing these" with "such".	Disagree, but wording changed
294		Intro	178	We are concerned that there is a strong focus on the use of dry sows stalls and that the comments relating to alternatives to temporary confinement systems being investigated appears to disregard the fact that when the current code was issued, 55% of sows were not housed in dry sow stalls i.e. alternatives are already in use. This section needs to take into account the management techniques used with sows not housed in dry sow stalls to deal with aggression etc.	Disagree
299		MS 9	24	In intensive animal agriculture, the obligation to allow an animal behavioural expression is repeatedly given low precedence, particularly in the commercial pig production industry. This works in favour of much current industry practice. However NAWAC considers that the degree of restriction which close confinement systems impose on the ability of animals to express their normal patterns of behaviour can be supported ethically only when; compared to other management systems, demonstrable and significant animal welfare benefits must accrue from such close confinement; such close confinement must be applied for the minimum period necessary to realise those benefits; and active attempts must be made to develop and use viable alternatives, which are acceptable in animal welfare terms, to such close confinement. Nowhere in the Animal Welfare (Pigs) Code of Welfare 2005 or the draft Animal Welfare (Pigs) Code of Welfare 2009 do NAWAC seriously address the negative and detrimental behavioural implications for keeping pigs restricted for lengthy periods of time in close confinement systems. Instead NAWAC fall to reiterating justifications for the preservation of current industry practice (ARLAN, 2001). This is contrary to the Animal Welfare Act 1999 which stipulates that Codes of Welfare must be designed to ensure that the needs of animals are met (including the expression of natural behaviours)	Noted

				in accordance with section 10 of the statute, not as provisions for the entrenchment of current industry parameters (ARLAN, 2001).	
299		MS 9	88	Pigs can be managed indoors by providing an environment simulating outdoors. Obstacles that pigs can hide behind, or inside, allows pigs lower down the social hierarchy the ability to avoid more dominant pigs. Making sure that plenty of food is available helps to reduce fighting to a minimum. Farmers need to be more creative when dealing with pigs: supply pigs with a walk through shower in hot weather, play music, anything necessary to provide pigs with a stimulating environment. More work perhaps, but that is inevitable when you remove animals from their natural environment. Farmers need to cull aggressive animals; pigs have distinct personalities - eliminating aggressive individuals will greatly reduce injuries.	Noted
299		MS 9	123	The minimum standard is misleading and open to broad interpretation. If for example, a pig excessively bar-chews it could be considered 'normal' within the constraints of the housing system as stated in the minimum standard. Excessive bar-chewing is not a 'normal' behaviour under any management system. Note: Farms often claim that constant squealing, bar-chewing and salivating are normal part of the behaviour of pigs. Although these behaviours (apart of bar chewing) are part of the normal behaviour repertoire of pigs kept in free-ranging family groups, they are exhibited at specific times for relatively short durations. When an animal is prevented from performing its full behaviour repertoire (e.g. rooting, social interaction) it fills the void with behaviours it can perform. In time these behaviours become stereotypic and are classed as abnormal. Scientific studies clearly define these abnormal behaviours as a coping mechanism created by the animal to cope with a stressful situation. Animals showing signs of abnormal behaviours are further classified as having a compromised welfare and suffering psychologically. Prolonged psychological suffering leads to chronic illnesses.	Noted
299		MS 9	179	Minimum Standard No.9 is weak. The Code must spell out minimum requirements in regard to bedding, foraging material, social contact, and environmental enrichment. By failing to set such standards, NAWAC fails in its responsibilities.	Disagree
299		MS 9 (a)	24, 232, 242,	MS be reworded to read as follows: Pigs must be housed and managed in ways that enable them to display as wide a range of natural behaviours as possible. Housing must under no circumstances contravene the principles	Disagree, but wording changed

				of the Animal Welfare Act 1999.	
299		MS 9 (a)	62	Making the ability to express a wide range of behaviours conditional upon the design of the housing system shows just what is being put first in NAWAC's considerations. It should be having the welfare of the animals as its foremost consideration. Housing systems should be designed to ensure pigs can express their natural forms of behaviour. This condition severely undermines the value of this Code in meeting the requirements of the Animal Welfare Act.	Noted
299		MS 9 (a)	138	The qualification "within the constraints of the housing system" renders this a meaningless requirement, given that the "housing system" may include dry sow stalls, farrowing crates, and the cramped conditions for group-housed pigs and for boars discussed above.	Noted, wording changed
299		MS 9 (a)	159	What does this mean? Poor language. One could use the excuse that only one behaviour can be exhibited because of the housing system and that was eating. My main objection is the inclusion of "within the constraints of the housing system". This allows for all sorts of abuses and should be removed. However, the Act requires animals to be kept in a manner such that display ALL their natural behaviours.	Disagree, but wording changed
299		MS 9 (a)	164	We reject the clause that suggests proper care and treatment of pigs should be only "within the constraints of the housing system". This is unacceptable and condones inhumane and substandard treatment of animals.	Disagree, but wording changed
299		MS 9 (a)	173	As written, the Minimum Standard is meaningless. The words "within the constraints of the housing system" shall be removed.	Agree, wording changed
299		MS 9 (a)	196	This statement, while appearing to promote animal welfare is far too open to abuse. It allows the mental welfare of the pig to be determined by its housing situation. We would like to have the words " <i>within the constraints of the housing system</i> " removed.	Noted, wording changed
299		MS 9 (a)	198	I am concerned about the phrasing of Minimum Standard 9. The phrase "within the constraints of the housing system" appears to give pig farmers room to say that if pigs are restricted in the range of behaviours they display because of being housed in tiny stalls, that is justified because it is as wide a range of behaviours as is possible within the constraints of the existing housing system. Minimum Standard 9 does not appear to promote improvement of pig housing from current conditions.	Noted, wording changed
299		MS 9 (a)	200	Minimum standard number 9 is of particular concern: If the housing system is allowed to be inhumane, the pigs cannot display a "wide range of	Disagree, wording changed

				behaviours". The standard is meaningless because the constraints of the cage housing system do not allow for any natural behaviour.	
299		MS 9	109	MS should be added: (b) Environmental enrichment should be provided for all pigs and it should be designed to elicit a range of natural behaviours.	Disagree
300		Indicators	62	The Example indicators contain too many subjective terms. These (low level, minimal, sufficient) need to be quantified to describe acceptable levels of negative interactions/behaviours. Again, the Example indicators suggest a 15% level of wounding is acceptable. It is not.	Agree, wording changed  Agree, wording changed
BP 5:		Indicators	159	<i>BP 2:</i> Define minimal.  <i>BP 4:</i> As above 15% of what? <i>BP 5:</i> Delete " <i>where the design of accommodation allows</i> ". The accommodation should ALWAYS allow for sufficient quantities of nesting material as use of this is part of the natural behaviour and is therefore required under the Act.	Disagree, but wording changed Agree, wording changed Disagree, but see addition of MS and RBP relating to nesting material
300		Indicators	164	<i>BP 5:</i> We also reject the related 'indicator' that suggests that proper prenatal care and conditions for sows could be "subject to the design of the accommodation allowing". The farrowing conditions of pigs should be mandatorily improved. An improvement in their conditions has been delayed for "transition" for far too long already.	Disagree
300		Indicators	178	<i>BP 3:</i> Suggest "Low levels of aggressive social interactive behaviours are observed".	Disagree, but wording changed
300		Indicators	179	The example indicators are vague and unenforceable. <i>BP 4:</i> What does this 15% refer to, how was it arrived at, and why is it considered to be an acceptable level of aggression? If it means that up to 15% of animals may exhibit wounds, then this is an appalling level and would indicate that the pigs are subject to deprivation on a routine basis. As an indicator of acceptable behavioural standards, it is reprehensible.	Agree, wording changed
300		Indicators	196	<i>BP 5:</i> Again this statement is open to abuse. It allows the provision of nesting material to be determined by the housing situation. We would like this statement to be changed so that all farrowing sows are given sufficient nesting material to enable them to farrow in as natural an environment as possible. There must be no possibility that nesting material is seen as	Disagree, but see addition of MS and RPB relating to the provision of nesting material

				optional.	
300		Indicators	198	<i>BP 5:</i> I am also concerned about the phrasing “ <i>where the design of the accommodation allows.</i> ” Once again, the design of existing housing seems to dictate the level of welfare provided for pigs, rather than the welfare requirements of pigs dictating the housing design.	Disagree
302		RBP (a)	109, 123, 204	Should be a minimum standard. These are likely to promote varied behavioural repertoire, reduce aggression and stereotypical behaviours.	Disagree
302		RBP (a)	173	Under natural conditions, pigs spend a large proportion of the day rooting and foraging for food. Even pigs that are well-fed on commercial rations spend up to 20 per cent of their time rooting and foraging. This suggests that the urge to root and forage is separate from the feeding instinct and needs to be satisfied as part of “normal behaviour”. Experimental evidence supports this claim. Incidences of stereotype behaviour are reduced markedly when sows are provided with straw or other material to play with. References cited.	Noted
302		RBP (a)	193	Owners and persons in charge of pigs should also be made to supply straw, woodchips, sawdust or other suitable materials that allow pigs to root, paw, mouth and chew. These are all good normal behaviors that come from pigs being inquisitive, so should be allowed. Other things that help keep pigs entertained include rocks for them to push around, food balls, and hanging ropes or chains for them to play with.	Noted, but disagree inclusion as MS.
302		RBP (a)	298	I disagree. Whilst provision of rooting material might seem a ‘nice’ thing to do for pigs (and I support this notion) I consider it should not be made best practice for ALL pigs because it has not been shown to be essential for ALL pigs. There are some housing types that confer considerable advantages upon pigs but which are incompatible with use of straw or other ‘rootable’ material. Animal behaviour is designed to facilitate the perpetuation of the species. Those animals with the strongest expression of survival-related behaviour are usually the animals that survive and are the most successful at procreation. Our domestication of animals renders some of the ‘survival behaviours’ superfluous. Pigs have some very characteristic behaviours, for example, rooting in the ground. They are equipped with a unique organ, the snout. A pig’s snout is an amazing organ – it is capable of very sensitive tactile sensations yet can plough rocky soil. Rooting is a behaviour that enables	Disagree



				pigs to find subterranean food. Housed pigs still possess the instinct to root but they no longer need to do so. Consequently, housed pigs spend less time using their snout in a rooting fashion than do sows outdoors. While it seems to us desirable to provide a rootable substrate for housed pigs, there is no evidence that actually being unable to dig up a concrete floor is deleterious to indoor pigs. My observations over many years indicates the whilst indoor pigs have the ability to root, and like to use their snouts to explore their environment particularly to see if there is anything they can destroy, they are not dismayed about not finding food when they do this because they are well aware that food will soon be delivered to them. What I am saying is that as scientists we need to be careful about becoming too 'carried away' by the notion that all behaviours of pigs in the wild need to be expressed by housed domesticated pigs.	
304		RBP (b)	123	Should be a minimum standard. These are likely to promote varied behavioural repertoire, reduce aggression and stereotypical behaviours.	Disagree
304		RBP (b)	159	Delete " <i>where practicable</i> ". It should always be practical to remove injured pigs. Housing and pens should be constructed kept available for this purpose.	Disagree
307		RBP (c)	178	We believe that this issue should be emphasised.	Noted
308		RBP (d)	123	Should be a minimum standard. These are likely to promote varied behavioural repertoire, reduce aggression and stereotypical behaviours.	Disagree
311		RBP (e)	178	Insert "at" between "either" and "individual".	Agree, change made
317		RBP (g)	62	It is not adequate for ways to simply be 'considered'. They should have to be 'implemented'	Agree, moved to MS
317		RBP (g)	123	Should be a minimum standard. These are likely to promote varied behavioural repertoire, reduce aggression and stereotypical behaviours.	Agree, moved to MS
317		RBP (g)	164	We support good socialization and interactions between pigs, including family groups and sexes. We also support separation of boars and sows when required to protect against aggression but not so that newly pregnant sows are locked away from other animals, sunlight and fresh air.	Noted
317		RBP	164	We support nice bedding conditions for all pigs and proper intellectual stimulation (befitting the intelligence of pigs) and social interaction while minimizing aggression.	Noted
322		GI	109	The following points should be added to this section: Enrichment should be provided in sufficient quantity to reduce competition over resources. Environmental enrichment should be varied regularly in order to maintain	Disagree

				its effectiveness and to reduce boredom levels. Rooting material should be supplied continuously.	
322		GI	164	Should be RBP. Pigs should be provided with stimulation, toys, contact, variety and respite. To deny pigs' access to these fitting stimulus and natural behaviours is immoral and inhumane.	Agree, Moved to RBP
331		GI	178	Suggest "or using baffles..."	Agree, change made
	5.1 Sows and Piglets				
342		Intro.	109	The use of the word 'ideally' should be omitted.	Wording has been changed
343		Intro.	109	The failure to allow the sow 'some freedom of movement and the opportunity to engage in nest building behaviour' would be a breach of two of the internationally accepted five freedoms (freedom from discomfort and freedom to express normal behaviour).	Agree, minimum standards in this section allowed under 73 (3)
340-345		Intro.	178	Once again this contains "shoulds" and "musts" which should be either MS or RBP.	Agree, wording changed
345		Intro.	178	The welfare benefits of providing space for piglets to move away from the sow and so decrease the possibility of crushing have been demonstrated. We would like to see more information in this section on the different types of farrowing crates/pens, for example the Werribee Farrowing Pen which, while providing close confinement in the first week after farrowing – the period when the majority of piglet deaths occur – allows expansion with greater room for the sow to move as the piglets grow and gives similar results to crates which are more confining. While these pens would obviously take up more room than the conventional crates, they do offer better welfare for the sow.	Agree, information added to GI
345		Intro.	298	In mammals mothers suckle and babies suck. This has piglets <i>suckling</i> .	Disagree
353		MS	178	There is no MS 10.	Agree, numbering corrected
353		MS 11	21	I also request that for the following 2-3 years that pigs must endure confinement, that NAWAC rules they be provided with straw or some other material to cover concrete floors to give some semblance of comfort and to enable them to prepare a bedding for delivery of their piglets in accordance with their natural instincts.	Disagree  Agree, MS added to phase in the addition of material before farrowing to enable nesting behaviour

353		MS 11	24	<p>Sows may be confined to farrowing crates just prior to parturition and will suckle their piglets there for approximately five weeks. There is typically no provision of nesting or bedding materials in such close confinement systems due to the additional expense and labour such materials would necessitate. Sows have a strong behavioural drive to nest build prior to parturition. Willingness-to-work studies have shown that sows in intensive systems are willing to work hard to gain access to nesting materials such as hay and straw. Frustrated attempts to gain access to nesting materials, as well as the lack of provision of such materials, have been demonstrated to result in signs of stress including increased plasma cortisol levels and increased restless activity. Additionally, in the farrowing crate the sow has only enough room to stand up and lie down. Movement, including walking and turning around, is prohibited in this system. Research has established that sows which are unable to turn around and move in order to arrange nesting materials (whether such materials are present or not), will also exhibit increased plasma cortisol levels indicating stress. The farrowing crate is a close confinement system and the nature of such systems clearly frustrate the purpose of section 10 of the Animal Welfare Act 1999 which stipulates that animals must be able to express normal patterns of behaviour. It has also been documented that pre-parturient sows confined to crates become more restless and change posture at a greater rate. Industry often sites that the primary function of a farrowing crate is to protect piglets from being crushed by the sow. Conversely, a more recent study conducted at Massey University found that despite the use of farrowing crates up to 6 per cent of piglets die as a result of being savaged or crushed by the sow. The study concluded that farrowing crates prevent sows from expressing instinctive behaviours which minimise piglet mortality. In a more natural situation sows will signal their intent to sit or lie down by making snout contact with their piglets followed with rooting in nesting material. Farrowing crates limit the sow's movements and do not enable the sow to undertake rooting behaviour or make easy contact with her piglets, thus the risk of injury to the piglets is vastly increased. The draft Animal Welfare (Pigs) Code of Welfare 2009 proposes to limit the use of farrowing crates to four weeks post-farrowing from the date of issue of the finalised code. This indefinite phase down period contravenes section 10 of the Act (ARLAN, 2001) as the sow is unable to express her natural behaviours in a system of such close confinement. The result is</p>	<p>Noted</p> <p>Disagree</p>
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				legalised cruelty. Upon examination of the research available, it becomes apparent that the main advantage of farrowing crates is for the pig industry rather than for the sow or her piglets. This is because farrowing crates allow for more cost effective management systems and the reduction of labour costs, thus resulting in more profit per animal for the industry. (References cited in submission)	
353		MS 11 (a)	198	I am opposed to Minimum Standard 11 because it does not go far enough to protect sow welfare. Sows should be guaranteed enough space to move around, not just to stand up and lie down.	Disagree
353		MS 11 (b)	21	Minimum sizes of crates. This is appalling considering that the present size of the enclosures allows no room for movement apart from standing and lying. It will lead to even worse cramped conditions for already beleaguered pigs. I ask NAWAC to not consider such a retrograde step.	Disagree
353		MS 11 (b)	61	The draft code is now outcome –based rather than a prescriptive code , which could well see animals being kept in even more cramped conditions than they already are. Instead of specifying minimum sow or farrowing crate sizes that pig farmers must legally adhere to, it is replaced with more generalised comments regarding the animals’ physical and behavioural requirements. Considering farmers have allowed the ongoing severe confinement of sows I fail to see how NAWAC ‘S thinking of relying in good stockmanship , will work in favour of the well being of the pig. (which makes the removal of specified minimum sizes of sow and farrowing crates very scary and a total retrograde step in pig welfare).	Disagree, but minimum size now stated as MS.
353		MS 11 (b)	67	In the Draft Code NAWAC has made some recommendations for the sizes of crates. We DO NOT accept that these in any way will ease the discomfort and distress that pigs suffer in this cruel confinement.	Noted
353		MS 11 (b)	123	The minimum standard does not meet the physical, health and behaviour needs of sows by not allowing them to turn around, make nests and move to separate dunging area. Therefore, the minimum standard does not meet obligations under the Animal Welfare Act 1999. If sows are to be kept in farrowing crates for any length of time provisions should be made for turning around, nesting and dunging away from bedding.	Disagree, but see MS and RBP relating to the provision of nesting material
353		MS 11 (b)	133	Whilst the reduction of time to be spent in farrowing crates is and improvement, I suggest that it should be also become mandatory to increase the size and comfort of these methods of confinement until phasing out occurs.	Disagree
353		MS 11 (b)	134	Is unacceptable recommendations that “sufficient’ sizing is allowed. I	Disagree

				believe there needs to be a complete ban of farrowing crates as no kind of metal farrowing crate is going to allow “sufficient” sizing for a lactating sow to perform natural farrowing behaviours. There is no mention to giving the farrowing sow room to move around, walk and satisfy her instinctive needs to eliminate waste in a separate area to where she rests. Frustration caused by restriction of basic maternal instincts such as interaction with her piglets can lead to a build up of stress hormones, resulting in redirected aggression. Current farrowing crates in NZ are detrimental to the health and welfare of both the sow and her offspring.	
353		MS 11 (b)	146	I would like to suggest that actual minimal measurements be enforced. ie: a quantifiable size based on the proportions of the largest size of sow and still allowing for lying at full length and standing at full height.	Disagree
353		MS 11 (b)	147	My thoughts are that all sows are not the same size, so limiting the farrowing pen dimensions is restricting for some.	Noted
353		MS 11 (b)	211	Why have the specifications for minimum sizes of sow crates been removed?	Noted
353		MS 11 (b)	298	Cannot be met in outdoor arks. A sow is unsupported in an ark. A litter born in an outdoor ark is at considerably greater risk of injury than a litter born to a sow in a farrowing crate.	Disagree
353		MS 11 (c)	147	As for the issue with sows lying on or eating their piglets, if the stall was divided lengthwise so the sow was in a big pen and the piglets just a grated barrier away, they could still feed without any risk. This barrier could be raised or lowered as required. This way the sow could be released daily to a larger enclosure or outside for a few hours then reunited with her piglets. I realise this is extra work for the farmer, but it would only take a second to drop or raise a barrier and open a pen door. Obviously it would take longer to get the right pig in the right stall again. I don't know enough of pig behaviour to know if they would go back to their piglets themselves. I am no expert, just an animal lover, putting out ideas for consideration.	Noted
353		MS 11 (c)	228	Farrowing takes place in modern European designed and built farrowing crates. One hundred and forty of these were imported from Holland 3 years ago at a cost of \$2500 each, plus installation. The reason for this purchase was that with countries like Holland and Denmark who are fazing down sow stall use to the first four weeks after mating, are the same countries allowing and encouraging the use of farrowing crates as the best option for farrowing.	Noted

				<p>Holland &amp; Denmark are world leaders in research on the welfare of sows, so we took it for granted that N.Z. would want to be up with the world best on welfare. These new crates are very good and provide excellent welfare advantages over our old system, saving the life of at least one piglet per litter. Taking this over 12 months in our case, 35 farrowing per week x 52 weeks per year gives 1820 extra piglets that would have otherwise not survived. This has to be animal welfare at its very best. The sows are removed after 24 days from the farrowing crates and are in stalls for one week for mating which better manages stress at weaning and makes for ease of handling and mating for both sows and staff. The sows are then returned in their groups to their open straw based pens for their gestation period (115) days. So our sows spend over 80% of their time in open barns on straw where they are free to roam around.</p> <p>I urge NAWAC that above all else to encourage the industry to use and retain modern farrowing crates.</p>	
353		MS 11 (d)	1	<p>I also want more action taken in removing farrowing crates completely. I understand that there are many making money from this practice, but that still doesn't make it right. NO mother should have to go through this traumatic experience. She needs to be cared for. Why, as humans, should we restrict any animal from doing what comes naturally to them and confine them to a tiny crate? No natural light, fresh air, room to move, to breathe! It is wrong.</p>	Noted
353		MS 11 (d)	4, 5, 7–10, 12, 14, 20, 21, 23, 31, 33, 39, 43, 44, 47, 69, 71, 80, 89, 95, 99, 111, 114, 119, 124, 128,	<p>The majority of piglet crushing happens within the first 72 hours after birth. As such, please restrict farrowing crate use to four days until the full phase-out of farrowing crates.</p>	Disagree

			129, 131, 132, 139, 143, 144, 155, 156, 157, 158, 165, 169, 170, 179, 184, 187, 191, 194, 197, 207, 220, 222– 227, 229, 250, 252, 254, 307,		
353		MS 11 (d)	6	Time spent in any type of crate (sow or farrowing) should be reduced as soon as possible.	Noted
353		MS 11 (d)	66	Other systems to protect the piglets, but also allow the sow a better quality of life, are available. Piglets are at greatest risk of being crushed by their mother in the 48-72 hours after birth. If farrowing crates are used they should not be used longer than four days. The Green Party requests NAWAC to limit the use of farrowing crates to four days after farrowing until these crates are banned altogether.	Disagree
353		MS 11 (d)	140	Limit farrowing crates to 4 days and house pigs and piglets on straw after	Disagree

				that- research from Europe would indicate losses are not different to farrowing stalls if they are on straw.	
353		MS 11 (d)	173	In addition, it has been established that the risk of piglets being crushed is greatest in the 48-72 hours after birth. <sup>27</sup> Keeping sows in farrowing crates for four weeks therefore has no animal welfare justification, and therefore appears to be more about maximising profit than improving welfare. Amend as follows: If sows are to be confined in farrowing crates, it must be for no more than four days post farrowing in any reproductive cycle after 31 December 2011.	Disagree
353		MS 11 (d)	178	There is concern from veterinarians working with pigs that the four-week period does not allow for the use of nurse sows in farrowing crates. More piglets are born than there are teats to feed them so the common practice is to use another (nurse) sow. This is achieved by taking a sow whose litter has just been weaned and use her for an extra week. The number of nurse sows required varies from farm to farm and from time to time, but is commonly between 5 and 10%. If this option is removed from farmers, the only practical options available are to (1) wean some piglets earlier than is desirable and when their ability to cope with weaning is marginal, or (2) kill a portion of piglets each week. The suggestion from the PVS is to revert to the standard in the previous code of a total of 6 weeks in any reproductive cycle, which would cover the pre-farrowing period as well as providing for the use of nurse sows.	Disagree, though MS added
353		MS 11 (d)	204	Aspects of the code that this submission supports: The restriction of confinement in farrowing crates to not more than 4 weeks post-farrowing, although not the draft code's failure to specify a phasing out time frame.	Disagree
353		MS 11 (d)	211	Freshpork Farms Ltd would prefer to see flexibility allowed within that requirement to allow the nursing of fostered piglets such that the sow be allowed to occupy the farrowing crate until the piglets are 4 weeks of age. While the percentage of sows that would do this is low there needs to be a concession for this for the sake of the piglets. If this concession is not permitted then there will be cases where piglets will be weaned below 3 weeks of age which is not ideal in every situation. The Code should also permit sows to be placed in a farrowing crate in sufficient time before farrowing to avoid an early birth happening in the dry sow accommodation, a situation that is very welfare unfriendly for piglets. It seems ironical that Europe requires a lactation of at least 4 weeks for the	Disagree, though MS added



				sake of the piglet and yet the proposed code sets an upper ceiling of 4 weeks.	
353		MS 11 (d)	3, 123, 128, 149, 150, 151, 160, 168, 170, 176, 191, 195, 219, 269, 310– 312,	I oppose the use of farrowing crates for any length of time and would like a complete ban.	Noted
353		MS 11 (d)	4, 5, 7– 10, 12, 14, 20, 23, 31, 33, 39, 43, 44, 47, 69, 71, 80, 89, 95, 99, 111, 114, 119, 124, 129, 131, 132, 134, 155– 157,	Farrowing crates contravene the Act, and there appears to be little evidence to suggest that farrowing crates provide superior animal welfare. Without evidence to show that farrowing crates are superior, the Act should take precedence. Please add a phase-out date of December 2013 (or 2010 some (4, 39, 43) standard letters) (207: 2012) for farrowing crates.	Disagree

			165, 169, 184, 187, 194, 207, 220, 222– 227, 229, 250, 252, 307,		
353		MS 11 (d)	11	<p>A complete ban on farrowing crates should be phased in. Although farrowing crates undoubtedly offer a more complex situation than gestation crates, NAWAC's own criteria for phasing out farrowing crates is the availability of systems offering "comparable protection of the piglets while allowing sows greater freedom of movement and fulfilling their desire for nest building and isolation from the herd at the critical period around birth." Yet, as of the last decade, indoor "family systems" have existed that meet this standard. A prominent industry study comparing 48 sows and their litters in such systems and in farrowing crates, found that sows in family systems spent less time lying inactive, showed more substrate-directed behaviors, and showed less pen-directed behavior than sows in farrowing crates. Most significantly, the study found no significant difference in piglet mortality between the two systems (see S. Arey and E. Sancha, "Behavior and Productivity of Sows and Piglets in a Family System and in Farrowing Crates," Applied Animal Behavior Science, 50.2 (Nov. 1996), 135-145).</p> <p>New Zealand free range pork farmers already use crate-free farrowing systems that quite clearly meet the criteria set out in the draft code - sows receive adequate space and piglets do not suffer undue mortality. Of course these systems are outdoor not indoor, but NAWAC's policy is clear that close confinement systems should only be allowed where significant animal welfare benefits result. No where does it restrict this comparison to indoor systems exclusively.</p> <p>Given outdoor systems that offer superior welfare outcomes are already</p>	Disagree

				used in New Zealand - and given indoor systems work that would meet the criteria, as per the study above - NAWAC should ban the use of farrowing crates.	
353		MS 11 (d)	13, 75, 121, 136, 189, 231,	I strongly oppose the continued use of farrowing crates. These are inhumane and obstruct the natural behaviours of the pigs.	Noted
353		MS 11 (d)	15	My non-expert view is that farrowing crates are likely to be needed to maximise animal welfare foreseeable.	Noted
353		MS 11 (d)	17, 35, 37, 45, 60, 74, 77, 87, 91, 93, 102, 103, 108, 112, 122, 130, 145, 148, 154, 159, 164, 174, 177, 185, 193, 196, 199, 200, 205, 206, 212, 214,	Ban farrowing crates immediately (forthwith).	Disagree

			246, 247, 249, 268, 304, 302, 305, 308, 313, And 13,180 postcar ds And +9 emails		
353		MS 11 (d)	21, 22, 27, 29, 41, 79, 81, 83, 90, 105, 120, 197,	We oppose confining pigs in any type of crate and ask that farrowing crates be banned before 2012 (some submissions by mid 2011).	Disagree
353		MS 11 (d)	24, 232, 242,	MS be reworded to read as follows: (a) As of 1 January 2011, farrowing crates must not be used. (b) Farrowing crates in any new facility after the issue of this code must not be built or used.	Disagree
353		MS 11 (d)	25	I accept the necessity of keeping sows in crates for a maximum of 4 weeks while nursing very young piglets, although I believe the lack of alternatives is more to do with economics of providing enough separate space than the welfare of the piglets.	Noted
353		MS 11 (d)	34	I believe that the use of any form of crate is unacceptable as they are extremely cruel and cause the pigs great suffering. It may be appropriate to isolate the sows when they have small piglets but in reasonable sized cages where they have room to move.	Noted
353		MS 11 (d)	46	I support eliminating farrowing crates for pigs. These techniques are inhumane and are worse than imprisonment of people – carried out as a	Noted

				punishment for wrongful acts. What was the pig's wrongful act that leads to this excessive punishment?	
353		MS 11 (d)	62	Furthermore, the length of time being proposed for allowing sows to be confined to farrowing crates is still far too long. Given that most accidental piglet mortality occurs soon after birth, a maximum of one week confinement should be permitted and this only as a temporary measure until farrowing crates are also phased out.	Disagree
353		MS 11 (d)	66	Sows will still be confined to farrowing crates for ten weeks per year forever. Farrowing crates also do not meet the obligations of the AWA. To let their use continue is therefore wrong and goes against the intentions of the Act. Farrowing crates are just as cruel as sow stalls. The Green Party requests NAWAC to end the use of farrowing crates by December 2013.	Disagree
353		MS 11 (d)	67	Specifically, we asked this farmer if he suffered any significant piglet mortality in his free range operation due to piglets being smothered by their mother (the usual justification for the use of crates). In his response, he was clear: "The increased risk of a piglet being crushed is far outweighed by the need for the sow to be able to display her normal behaviours, i.e. building a nest and mothering her piglets." This farmer went on to say that good design in the construction of chalets/huts would minimise the risk of piglets being crushed by the mothering sow. We believe that this farmer, and many others with similar operations, have demonstrated that it is possible and economically viable to farm pigs without the use of crates. NAWAC has conceded that crates and stalls should be banned at some point in the future. We are in agreement, except that the time to ban crates is now, with this review of the Pig Code of Welfare. If crates are not a good idea for some point in the future, they are not a good idea now. We accept that pigs can be aggressive. Especially when overcrowded, mothering their young or when competition for food is high. Where pigs are raised in natural environments, aggression seems not to be a significant factor. In the bush of NZ pigs are flourishing. Obviously they do well without crates in the wild where they have enough space and freedom. For the sake of the pigs: Say "NO" to crates and stalls!	Disagree
353		MS 11 (d)	72	We are asking for farrowing crates to be banned within the next year. How is it acceptable to allow farrowing crates to be continued as good practice for years to come?	Disagree
353		MS 11 (d)	84	The Chair of NAWAC has stated (in press release): "In the case of	Disagree

				<p>farrowing crates, no alternative that still provides protection for the piglets while allowing the sow more freedom to move around has yet been found anywhere in the world." This is also incorrect, and such ignorance from a supposed expert is extremely disturbing. The 1997 Scientific Veterinary Commission report cited scientific studies comparing piglet mortality in Denmark, where farrowing crates were allowed, and Sweden where they were not. No difference in piglet mortality was found. More recently, studies in Switzerland have confirmed that there is no difference in piglet mortality when comparing sows in farrowing crates and roomier pens. The references in APA citation format were given.</p> <p>My submission is that farrowing crates should be banned from 31 December 2012, if not sooner.</p>	
353		MS 11 (d)	88	<p>Sow crates are unacceptable supply sows with areas they can be alone, and provide a good depth of soft bedding to avoid crushing. Some losses will occur, but that is the nature of farming - perhaps we need to concentrate on growing smaller pigs. I've never experienced sows killing and eating piglets in a free range situation. That would indicate to me that the pigs are kept under completely inappropriate conditions.</p>	Noted
353		MS 11 (d)	98	<p>There is no doubt that the use of farrowing crates denies pigs from their behavioural need such as nesting, rooting, wallowing and foraging. Many of the behaviours such as aggression and piglet killing/eating are a result of extreme boredom, frustration and depression which is, in most cases, a direct result of confinement and inability to fulfil natural behaviours. The majority of accidental crushings occur within the first 72 hours of birth, and it would be very unlikely to occur after 1 week. I would like the total ban on sow crates brought forward to 2013.</p>	Disagree
353		MS 11 (d)	101	<p>The use of farrowing crates will be limited to four weeks post-farrowing from the date of issue of the code. I support this as an interim measure, and the long term direction signalled by the draft code. But the code needs to be more specific about the path to phasing them out, including a date no later than 31 December 2015.</p>	Disagree
353		MS 11 (d)	104	<p>This abominable practice must stop.</p>	Noted
353		MS 11 (d)	107	<p>These crates deprive the sow of her maternal nurturing instincts. They render conditions that breach the AWA in many ways and should be banned.</p> <p>Alternative systems that protect the piglets while giving the sow more room and a better quality of life should be used. Such systems should not be</p>	Noted

				rejected simply because they are considered not 'viable'; economics cannot justify the continuation of the current barbaric system.	
353		MS 11 (d)	115, 248	We feel that the total banning of crates should be ratified at a much earlier date	Noted
353		MS 11 (d)	116	With regard to the new Draft code of Welfare for Pigs, I would love to see the end of the use of those farrowing crates within the next year or two. The industry has known for some time that the crates will be banned eventually, yet few farmers seem to have done anything about making other arrangements for sow care. The longer time frame they are given, the more they will procrastinate - this is human nature as we all tend to 'put things off'.	Noted
353		MS 11 (d)	134	I believe there needs to be a complete ban of farrowing crates. Alternatives: There are various types of loose farrowing systems. The practical explanation is where pregnant sows in group housed systems are given a selection of nesting boxes in the form of arks or individual shelters big enough for the sow to lie down and move around without being restricted. The days leading up to farrowing, the sow will pick her own nesting box and start her natural process of building a nest for her babies. The shelter will have a "lip at the door where the piglets are contained within the nesting box, but the sow may come and go as she pleases for feeding and toileting. The shelter is designed with sloping sides or guiding rails so there are areas in the corners and sides of the box for the piglets to move to and be safe when the mother sow does lie down to sleep or feed the piglets. Straw bedding not only caters to the sow's instinct to nest, well maintained it helps the piglets keep warm and dry. Research into piglet mortality rates found loose housed systems need not cause higher piglet mortality rates if sows are fed and managed appropriately. Results from Verhovsek et al. (2007) and Weber et al. (2007) discovered overall piglet mortality was determined by sizing and quality of environment. It is true piglet mortality is increased slightly in loose farrowing systems, but the percentage (which differs from farm to farm) is minimal and justifiable by the quality of life for the sow and piglets. Farrowing crates also cause piglet mortality.	Noted, but disagree. But see addition of MS – provision of nesting material phased in.
353		MS 11 (d)	138	The continued use of farrowing crates for 4 weeks post farrowing (equivalent to 10 weeks per year) with no requirement to phase this out. Such crates house sows in cramped conditions, where they cannot turn around or properly care for their piglets, in clear breach of ss 10 & 29(a).	Disagree

				<p>The Committee's assertion that there are no other alternative options lacks credibility, especially given that other jurisdictions have banned the use of these crates, and that many New Zealand pig farmers successfully use alternative systems.</p> <p>It is submitted that these crates should be immediately banned or rapidly phased out.</p>	
353		MS 11 (d)	142	<p>Agreed. There is currently little alternative in housed situations. However, sows must be able to comfortably lie down and not be exposed to their own faeces and urine</p>	Noted
353		MS 11 (d)	146	<p>I also wish to question the suggested maximum period of confinement to the farrowing crates, particularly in terms of why it suggested to be as long as 4 weeks. Since the Recommended Best Practice (c) is that "sows in farrowing crates should be provided with more space within 7 days of farrowing"; and since "most piglet mortality occurs within the first 4 days after farrowing" - the maximum time of confinement of a sow in a farrowing crate should be much shorter, for example 1 to 2 weeks maximum.</p> <p>It appears all the main parties (NAWAC, the NZ Pork Industry Board, and the public) are in agreement that the requirements of the proposed Minimum Standard No.. 11 are to be an interim step and that a viable alternative system for housing systems must be found and adopted. While alternative systems are being researched we must take the interim step right away and my suggestion is from 31 December 2010 (not 2012), or from the date the Code is passed.</p>	Disagree
353		MS 11 (d)	166	<p>We believe there is absolutely no justification for considering a ban on farrowing crates. The limited confinement of the sow at this time ensures the increased survival of her litter. Research supports this.</p>	Disagree
353		MS 11 (d)	173	<p>Safe opposes the use of farrowing crates</p> <p>Farrowing crates are similar to sow stalls in that they severely restrict the natural behaviour of the sow. In addition, a further welfare concern is that the natural instincts of the sow to make a nest are thwarted. In the 2004 Code of Welfare NAWAC states that farrowing crates do not satisfy the provisions of the AWA. NAWAC, however, has made no move to phase out farrowing crates, citing concerns over pigs crushing their young, and economic considerations. We note with concern that NAWAC does not repeat their assertion in the current draft Code of Welfare, nor do they provide any reasoning for changing their mind. If NAWAC considers that farrowing crates do not fully meet the obligations of the AWA this should</p>	Disagree, but MS added for the provision of nesting material to be phased in.



				<p>be stated in the Code of Welfare. NAWAC will then also have to use Section 73(3) of the Act to allow for their ongoing use.</p> <p>Issues with references cited are given in submission. In summary: There is no evidence that farrowing crates provide the only way to protect piglets, or even the best way. A 2001 review of the reduction in piglet mortality describes the alleged benefit of farrowing crates as “equivocal” and hard to estimate. A comparison of the best systems in Sweden, where farrowing crates are not allowed, and in Denmark, where they are, found no difference in piglet mortality. More recently, comparisons of piglet mortality in farrowing crates and in pens of five square metres or more, has shown that while mortality due to crushing was higher in pens, this was balanced by the higher rates of mortality in farrowing crates through piglets born dead or being savaged by the sow. Piglet survival also depends on selection pressure. Groups of piglets bred for higher survival showed no difference in mortality whether weaned in farrowing crates or outdoor systems. Switching from a farrowing crate system to one where the sow has room to turn around has been found to cause an increase in mortality in some cases, but it is unclear how much of this is due to the stockpersons having to learn about the new system. The increased restlessness of sows in farrowing crates may even increase the risk of piglets being crushed. The studies above show clearly that the causes of piglet mortality, like the causes of aggression, are multifactorial, and the competency of the stockpersons could have a huge influence. It is our opinion, therefore, that improved training of the stockpersons as already stipulated in Minimum Standard No. 1 of the draft code, together with better conditions for the sows, will lead to a situation which is better for sows and piglets.</p> <p>In conclusion, SAFE requires a phasing out of farrowing crates by December 2013. We consider the short phase-out time is fair, given that producers have had ample warning through the NAWAC comments on the 2004 Code of Welfare.</p>	
353		MS 11 (d)	179	<p>The 2005 Code of Welfare stated that "there are a number of alternative systems that may also be used", yet NAWAC in the 2010 Draft Code claims to be unaware of any viable alternative systems. NAWAC leaves it to the Pork Industry Board to investigate and (possibly) adopt other systems. This is simply not good enough. The majority of pig farmers already manage to produce pork without using farrowing crates. NAWAC</p>	Disagree

				<p>has an obligation to properly describe practicable alternatives currently in use in New Zealand and overseas, and to recommend such alternatives as interim best practice.</p> <p>Minimum Standard 11 lacks any commitment to phase out farrowing crates. Farrowing crates do not meet the obligation to prevent ill-treatment under the Animal Welfare Act, and are just as cruel as sow crates. Neither are the size requirements discernibly better than in the 2005 Code of Welfare. The risk of piglets being crushed by their mother applies only for the first few days after birth; there is no justification for incarcerating the mother in such a confined space any longer than necessary. There needs to be a mandatory phase-out by a set date within the next two years, at which time one of the alternative systems recommended as interim best practice must be adopted as a minimum standard.</p>	
353		MS 11 (d)	180, 181, 202, 218, 221, 230, 239– 241, 245, 271, 314	I'm against factory farming of pigs – sow crates	Noted
353		MS 11 (d)	190	<p>The welfare benefits of the farrowing crate (pen with stall) are self-evident if the interests of the piglet are considered as well as those of the sow. As a housing system they have my unreserved support as they are simply the best system available at present. I have limited experience with alternative farrowing systems indoors, simply because other systems don't work and so are rarely used. What experience I do have has only confirmed my support for the farrowing crate. I have considerable experience with sows that farrow outdoors in a variety of hut designs. On commercial farms in New Zealand, piglets are allowed to suckle for between 3-4 weeks before they are weaned. They are moved to the farrowing accommodation 4-5 days before this. Minimum Standard 11 as proposed adequately allows for this.</p>	Noted
353		MS 11 (d)	190	However, in some instances, given the live born litter size of the modern	Disagree, though MS

			<p>sow, it is necessary to use a portion of sows as nurse sows to provide a teat for each piglet as there are more piglets born than there are functional teats amongst their dams. The only sows available to provide these teats are sows due to be weaned as all other lactating sows are already occupied suckling their own litter. The number of nurse sows required varies from farm to farm and from time to time, but is commonly between 5 and 10% on high performance farms. These sows are only required to lactate for an extra week, rather than for the full 3-4 weeks that the surplus piglets must be suckled, as any farmer that is good enough to have surplus piglets also invariably operates a shunt fostering system i.e. surplus piglets born this week are placed on sows that farrowed last week, while her litter is transferred to a sow that farrowed the week before, such that a litter that is 2-3 weeks old is placed on the nurse sow. While shunt fostering alleviates the need to use nurse sows for more than a week, this is a fortunate consequence rather than its purpose i.e. shunt fostering is a necessary practice to match the nutritional demands of the litter with the sow's lactation status.</p> <p>As written, Minimum Standard 11 (d) does not provide for the use of nurse sows. If this standard is adopted and observed by farmers (i.e. only four weeks post-farrowing in the crate), the only practical options available are to (1) wean some piglets earlier than is desirable and when their ability to cope with weaning is marginal, or (2) kill a portion of piglets each week (or watch them starve). As farmers and their staff are focused on keeping as many piglets alive as possible, the killing of surplus piglets is unlikely to occur. I thus believe the minimum standard in the current Code (Minimum Standard No. 9 (b)) is preferable to that proposed in the draft Code (Minimum Standard No. 11(d)) as it allows for the 4-5 days before farrowing during which sows settle, for four weeks of lactation, and for sows to be used as nurse sows for an additional week where circumstances necessitate. NAWAC need not be concerned that this will encourage farmers to modify their current practices and retain sows in farrowing crates for longer. In practice, farmers attempt to move sows out of the farrowing accommodation as soon as possible as this is invariably a bottleneck on most farms, and the issue farmers have is that they cannot get the sows out of farrowing crates soon enough as the litter is too young, rather than that they have spare farrowing crates in which to house sows. NAWAC should retain the wording used in Minimum Standard 9 (b) of the</p>	added to allow for use of nurse sows
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				existing Code in preference to that in Minimum Standard 11 (d) of the draft Code. To do otherwise will either necessitate that farmers act in breach of the Code in the best (welfare) interests of their animals or that they wean some piglets before they are sufficiently mature to cope with life without mum.	
353		MS 11 (d)	198	I am very concerned that the Code does not nominate a date for the complete phasing out of farrowing crates. I agree that it is important to balance the sometimes conflicting needs of sows and piglets, and I support the inclusion of a requirement in the Code that the pork industry must continue to investigate alternatives to farrowing crates and report on their research to NAWAC and the public every year. However, I do not think this will do enough to advance the phasing out of farrowing crates. The pork industry has a vested interest in keeping its costs down, and so may not pursue alternatives to farrowing crates with as much vigor as an independent third party would. I suggest that there should be provision in the Code for independent third parties to lodge proposals relating to alternatives to farrowing crates with NAWAC for NAWAC's consideration.	Disagree
353		MS 11 (d)	204	Aspects of the Code that this submission opposes: The draft code's failure to require or give notice of future cessation of the use of farrowing crates. Substantial list of reasons given in submission. E.g. The draft code provides frustratingly little information in its discussion on this issue, especially given that economic analysis of a phase-out of farrowing crates comparable to that relating to dry sow stalls was not included within the brief of the economic report. Do all commercial piggeries use farrowing crates? If not, then a viable alternative surely exists.	Noted
353		MS 11 (d)	204	Aspects of the Code that this submission opposes: The draft code's allowance of confinement in farrowing crates of up to 4 weeks post farrowing. The draft code's 4 week restriction is less of an improvement on the 2005 requirement than it at first appears, given that in 2005 a maximum of 6 weeks' confinement was authorised, whereas the draft code prohibits more than 4 weeks post-farrowing, and recommends that sows be introduced to farrowing quarters 3 to 5 days before the piglets are due to be born. Minimum standard 11(d) should be tightened to preclude extended pre-farrowing confinement in the farrowing crates). Finalisation of the code should be briefly delayed while data on infant mortality in a farrowing crate situation is collated and analysed with a view to determining a scientifically based period of confinement, and an economic	Disagree

				analysis carried out on the industry costs of a reduced period if indicated by the research.	
353		MS 11 (d)	251	In regard to farrowing crates we are in favour of the improved conditions as proposed and endorsed by the New Zealand Pork Industry Board. However, the increased standards need time and investment to institute the proposed changes. We continue to advocate the need for the use of sow weaning farrowing crates, as these provide for animal safety, staff safety and reduced mortality rates.	Noted
353		MS 11 (d)	253	We have used crates for farrowing since 1982 and since then our weaning numbers have increased, due both to less overlays and improved genetics granted. But even now we see on average one pig per litter more weaned out of crates than the older type pens that we still have. Reducing mortality we believe is a very strong indicator of welfare, as well as having a huge financial impact on our bottom line.	Noted
353		MS 11 (d)	258	As we are one of the oldest piggeries operating in New Zealand we have experience with many different methods of housing stock. In the 1950's our sows lived and farrowed in the bush and under hedges, they would build nests of grass and sticks and have their litters, a big percentage of which would be squashed, frozen or drowned in mud – this was free range and when it rained the paddocks turned into mud. Next were A-Frame huts in paddocks – this was a slight improvement but in winter they were cold and the mud outside meant many piglets died of cold and scours – hardly welfare friendly. We then moved to concrete pens with a creep and guard rail, and with straw on the basis that this would assist with bedding and warmth. However we found that with the need for straw for bedding, losses were still high. At this stage our mating and gestating sows were still out on dust paddocks in summer and mud in winter. Then it was the Ruakura Round House – in these farrowing houses the sow walked in and because of the round shape she always lay with her back to the outside wall and udder towards the centre creep area. These worked slightly better for piglet losses but were a hazard for staff as to attend to the piglets you had to get in with the sow and it was hard to get out. Weaning average was about 7 pigs per litter. Then came the first type of farrowing crate, where the sow was in it for a week and then shifted to a pen with deep litter shavings two feet deep, however losses were still high as the sows would lie on the little pigs lying in the shavings – they were also very labour intensive taking out the old shavings and putting in the	Noted

				<p>new. Average weaning 7.5 pigs per litter.</p> <p>Approx 20 years ago we went to stalls and farrowing crates, since then our losses have reduced significantly both in piglets and sows. We now wean 10.7 pigs per litter and sow fighting is reduced dramatically.</p> <p>We submit the use of farrowing crates be allowed to continue without any time frame until an alternative system is available which will give the same results in terms of welfare and productivity for piglets and sows as crates.</p>	
353		MS 11 (d)	260	<p>I support the standard in the 2005 Code which allows the use of farrowing crates for 6 weeks in any one reproductive cycle (that is pre- and post – farrowing). I believe the proposal to limit the use of farrowing crates to 4 weeks post-farrowing will be detrimental to piglet welfare. Furthermore, it overlooks the requirement to allow sows to settle into their farrowing accommodation before farrowing, including allowing for natural variation in farrowing date of upto plus or minus 4 days.</p> <p>At the present time the average weaning age for piglets on my farm is 25 days, which in practice means that in any one week, piglets may be weaned between 21 to 30 plus days. In other words, there is considerable variation in weaning age due to natural variation in the actual farrowing day. At present there are litters are being weaned at 21 days but I would not meet the new code of no more than 28 days.</p> <p>In the past I have experimented with reducing the average weaning age down to 21 days but found that growth rates are compromised, more animals are treated for sickness and mortalities increase. Ideally and if we had more accommodation the weaning age would be closer to 28 days and this point was emphasized by my manager this morning.</p> <p>I believe that the current proposal would lessen the welfare of piglets.</p>	Disagree
353		MS 11 (d)	272	<p>PIC supports the continued use of farrowing crates and agrees that sows must not be continuously confined for more than four weeks post farrowing.</p> <p>In supporting this we are concerned that some parties may want this aspect of management banned. It is an accepted fact that the use of farrowing crates significantly reduces piglet mortality. We know from our own farms where farrowing crates are used, that piglet mortality is typically in the range of 7 – 10 %. In production systems where farrowing crates are not used, piglet mortality is in the range of 15 – 25 %. Furthermore we are not aware of any country in the world where farrowing crates are banned, nor have we</p>	Noted

				<p>seen any viable alternative system that provides a better management practice than the current system. The use of farrowing crates protects the piglets from being crushed by the sow and also reduces the risk of the sow savaging her piglets which can sometimes occur. The farrowing crate is for the welfare of the piglets. Having sows in farrowing crates allows the provision of two temperature environments in the farrowing room: (i) A comfortable environment (18 – 22°C) for the sow so that she maintains good feed intake during lactation allowing the piglets to suckle well and to ensure the sow maintains good body condition. (ii) A warm environment for the piglet (28 – 32°C) via an appropriate heat source (lamps, heated pads) that is away from the sow.</p>	
353		MS 11 (d)	273	<p>Some of my sows still farrow outside, but not for much longer. I have recently purchased new farrowing crates for half the herd and more farrowing crates will follow. Most of the sows farrow indoors with only occasional overflows farrowing outside. Sows stay in the farrowing crate for two weeks before being moved back outside for the second half of their lactation. They live outside for two more weeks in groups of about 20 sows, each with individual huts, with the piglets running free. They are weaned at four weeks. When I purchase more farrowing crates there will be no sows farrowing outside.</p>	Noted
353		MS 11 (d)	299	<p>Delete and replace with: If sows are to be confined in farrowing crates, they must be confined for no more than 6 weeks in any one reproductive cycle. The Draft Code proposes a minimum standard whereby the sow must be in a farrowing crate for no more than 4 weeks post farrowing in any reproductive cycle. NZPork's view is that the use of farrowing crates is more appropriately covered by the current 2005 Code of Welfare allowing 6 weeks in any one reproductive cycle because: Sows are currently settled in farrowing crates up to a week before they farrow Foster sows are used in a process called shunt fostering. When a sow is unable to feed all her piglets because of ill health or large litters, piglets are transferred to a foster sow. This subsequently extends her lactation. Nurse sows are also used at weaning to feed underweight piglets thereby extending their lactation. On some farms post weaning accommodation, hygiene, feeders and feed will not be suitable for newly weaned pigs if they are weaned earlier than</p>	Disagree, though MS added

				28-35days.And given that the current average weaning age in New Zealand is 26 days limiting the stay in farrowing accommodation will have serious consequences on the welfare of newly weaned piglets The Draft Code does not provide for any of these practices and significant welfare concerns will arise as a result.	
353		MS 11 (d)	300	I believe the code loses sight of the objective- which is to ensure the welfare of the animal, and surely measurement of animal welfare should be determined by scientific methods rather than by simply taking an emotive argument of allowing animals complete freedom of movement. We are talking about intensive farming here and not a play ground for fun. Scientifically an animal's welfare can be measured in many ways- such as productivity, (number of live piglets that survive and are healthy), absence of animal harm. If science supports the use of farrowing crates for a limited time in support of both the welfare of the sow and the piglet then science should be revered.	Noted
360		MS 11	173	Add: (e) Sows should be provided with nest building material from at least 48 hours before farrowing, with the exception of sows in farrowing crates. (f) No new farrowing crates can be built after this code comes into force. (g) No sows may be confined in farrowing crates after 31 December 2013.	Disagree, but see addition of MS and RBP relating to provision of nesting material
360		MS 11 (NAWAC note)	62	The space given to all pigs at all times covered by the Code should be sufficient, at the minimum, for the pigs to be able to turn and walk around. Just because these are animals that New Zealanders eat does not make them any different from those not generally eaten here, such as dogs and horses. All should always have room to move about. They are not mere economic machines. The comment by NAWAC includes the word 'viable'. Once again, NAWAC is putting the economic interests ahead of animal welfare. The latter should be its foremost consideration.	Noted
360		MS 11 (NAWAC note)	80	I am alarmed by the amount of time it is taking to find alternatives to farrowing crates - it appears that little tangible progress has been made since 2005. It does not seem satisfactory that the issue will be left hanging on reports from the NZ Pork Industry Board. It seems unlikely that this body will expend sufficient effort to find alternatives, given that it has defended the use of confinement in the past. To use a colloquial expression, it looks like the making the goat the gardener.	Noted
360		MS 11	109	It is somewhat misleading to state that there are no current viable	Noted



		(NAWAC note)		<p>alternative systems to the use of farrowing crates. Over 4 million sows in Europe are now kept in more humane alternative systems such as group housing with straw indoors, or outdoor housing. Sweden decided to ban sow stalls in 1988 when 80% of pregnant sows were kept in stalls. The ban has been in place from 1994, with an additional 2-3 years allowed for changes to 20 buildings. According to the Federation of Swedish Farmers, group housing needs good management and stockmanship but does not increase the overall labour required. The advantages are improved health and fertility in the sows, including improved longevity, fewer leg problems, better condition before farrowing, easier farrowing, fewer piglets born dead and less mastitis and agalactia. The fears that are raised about group housing are often due to lack of familiarity with the system and are not well-founded. In fact, the evidence is that sows suffer less stress in group housing than in sow stalls. A 1993 UK study of the behaviour, pituitary-adrenal function, immune system function and reproduction of sows in groups over their first and fourth pregnancies found that the group housed sows had established a stable social hierarchy by the fourth pregnancy whereas the stall-housed sows still had relatively high levels of unresolved aggressive encounters.</p> <p>The scientists conclude: (References cited in submission)</p> <p>In the long term, therefore, housing pregnant sows in groups would appear to be no more stressful than housing them in stalls. In fact, the behaviour data point to considerably more long-term problems for stall-housed sows. Research results from a number of countries all show that a sow's productivity is equally good in group housing. A 1997 report from INRA Pig Research Station in France found that the reproductive performance of small groups of 8 sows was comparable to the performance of stall-housed sows. A detailed comparative study of housing systems carried out by the Research Institute for Pig Husbandry in The Netherlands has also reported that the same number of weaned piglets per litter is produced in group housing as in stall housing.</p>	
360		MS 11 (NAWAC note)	175	<p>I find it staggering that NAWAC could even consider an alternative to farrowing crates. The farrowing crate provides the best possible protection for the piglets and the stockman. This can be seen in the void between pigs weaned in an outdoor farrowing ark arrangement and the farrowing crate. It also allows the stockman to safely handle the pigs with out fear of being attacked by a protective sow. The sow's restricted movement is the</p>	Disagree

				trade off for the welfare the piglets and the safety of the stock person.	
360		MS 11 (NAWAC note)	234	<p>40 years ago I vividly remember tending some new born piglets, they were in a big long pen, where the mother was as well, running free so to speak, one squawk from a piglet and I was baled up with nowhere to go, very frightening. So why do I still remember this day, simply because I don't want to go back there and it was distressing, not only for me but the mother and babies as well. There is a comment in the draft code indicating NAWAC's desire to ban farrowing crates: how would anyone in their right mind, who has the welfare of animals at heart, even be contemplating this, I have trialled a number of systems of farrowing but my practical experience is that the use of the farrowing crate has many advantages in terms of reducing the mortality of piglets. This is my practical experience based on my own farming situation. Where is the animal welfare in systems that allow greater mortality of piglets, people say its money, not at all, its animal welfare, pure and simple, and when there is something new, and works out there then this pork producer will be the first to put his hand up and say I'm in, but until something works better, I will strongly support the use of farrowing crates as being more animal welfare friendly and staff friendly in my own farming situation. We have on our unit the most modern Farrowing crates from France and Europe, we spent the extra money because we wanted the best for our sows and that's how we have always farmed and will continue to do so. Farrowing crates enable us to look after the piglets well being for the 4 weeks they are there, we can also feed and tend the sow without any danger to staff at all and she is able to be fed the right diets and be given any necessary medications without any problems, Farrowing Crates are Animal friendly and any thought of banning them without a good alternative would be a backward step for animal welfare in our Industry.</p> <p>I need tools like Farrowing Crates, to make it easier and better for the animals well being, and future. But banning Farrowing crates is against animal welfare, as an Industry we have made giant steps in all directions of our farming business, and this includes welfare, and no doubt we will in the future.</p>	Noted
360		MS 11 (NAWAC note)	262	The Farrowing crate at this stage has unequalled alternatives for looking after the large litters that the modern sow produces. It also makes the management and welfare far safer for the farm employees.	Noted
360		MS 11	272	PIC endorses the use of farrowing crates and it should remain in the draft	Noted

		(NAWAC note)		code until such time as a proven and viable alternative management system is developed.	
360		MS 11 (NAWAC note)	276	If we couldn't have farrowing crates I think most farms would give up. At least in the North Island anyway. When I started back in '74, I had all my sows outside. All the little ones were born in nissan huts in the open paddock. ...and decided we really needed to put those Mums and babies into a shed. Those horrible farrowing crates everyone talks about. But hang on a minute, what happens outside. Well I can tell you. In the winter, when it rained, the little nissan huts used to fill up with water, and the wee ones wouldn't survive. In the summer, the mums got too hot and over they would roll and flatten all the babies. You couldn't win. Great to see them outside if things were going alright. So inside they came and my sows are quite happy in the crates, and most of their babies survive. Most people when they think of animals don't think of the people who need care for them. I like to think we think of both, the animal's welfare and the welfare of our excellent staff.	Noted
360		MS 11 (NAWAC note)	297	We use farrowing crates primarily to help protect the young piglets from being laid on by their mother. Surely piglets being squashed and suffocated until they die is not a good welfare outcome. Therefore as a duty of care we need to do everything we can to reduce piglet mortality. We would therefore contend that NAWAC should recommend constraining the sow in a farrowing crate as best practice for the welfare of the piglets. This should remain the preferable management system until suitable alternatives have been scientifically proven. The view being portrayed by NAWAC of farrowing crates being undesirable compared to free-range production we believe is mis-guided and NAWAC should instead encourage the use of farrowing crates to achieve the best welfare outcomes.	Noted, Disagree
367		Indicators	62	<i>BP 2</i> : lacks objectivity. The indicator should be quantitative	Agree, wording changed
367		Indicators	146	<i>BP 4</i> : may be ambiguous and subjective, especially since the level of a pig's comfort is not measurable.	Disagree
367		Indicators	178	<i>BP 2</i> : What does "low" mean in regard to piglet mortality? <i>BP 7</i> : The floor surface indicator does not relate to the MS and needs to be explained further. It also should have "and" inserted between "mat" and "is".	Agree, wording changed
367		Indicators	298	Criteria cannot be met in outdoor arks. They should be deleted.	Disagree

				<p><i>BP 1:</i> Pig attendants cannot control which part of an ark a sow lies in. If a sow chooses to farrow at 2 a.m. with her vulva hard pressed against the wall of her ark, the pig owner or attendant cannot satisfy this indicator.</p> <p><i>BP2:</i> Piglet mortality rates in outdoor systems are higher than in indoor systems.</p> <p><i>BP 3:</i> Piglets are less able to move to a safe area in an outdoor ark than they are in an indoor farrowing pen.</p> <p><i>BP 5:</i> If a sow uses the side of an ark to support her as she lies down, she is more likely to crush a piglet sleeping against the side wall than if she lies down unsupported in the middle of the ark.</p> <p><i>BP 6:</i> Pig attendants cannot control which part of an ark a sow lies in. If she chooses to lie with her udder close to the side wall there will NOT be sufficient space for the piglets to escape.</p> <p><i>BP 7:</i> is satisfactory if 'or' is inserted before 'is littered ...'. Otherwise it is ambiguous.</p>	<p>Disagree</p> <p>Agree, wording changed</p> <p>Noted</p> <p>Noted</p> <p>Agree, change made</p>
368		RBP	134	Arks are preferably built on gently sloping areas with free draining soil to keep the bedding dry.	Disagree
371		RBP (b)	123, 134, 173, 198	Should be minimum standard Pre-farrowing she is restless and the nesting behaviours are never more apparent in the days leading up to farrowing. It is unacceptable it is not a requirement.	Disagree, but see addition of MS and RBP relating to provision of nesting material
371		RBP (b)	298	I disagree. Provision of straw is contra-indicated in most farrowing pens. It can make moving around more difficult for piglets, it can interfere with cleaning of the pen and drainage from it and it is a fire hazard (creep heaters sometimes fall or are knocked to the floor – disastrous in straw-floored pens in the middle of the night).	Disagree
373		RBP (c)	62	Recognizes that more space should be provided. Should be MS	Disagree
373		RBP (c)	123, 146	Should be minimum standard	Disagree
373		RBP (c)	298	I disagree. In practice, this provision of extra room has been associated with increased injury to piglets and an increased death rate of piglets.	Disagree
385	Mating stalls new section?		190	Mating stalls are used on all indoor farms that house sows in stalls for any part of gestation and on many that don't. Essentially they are identical to gestation stalls although they are often located in a separate area and sows usually only spend 7-8 days in them before they are moved to other	Agree, MS added

				<p>housing. These stalls make a very positive contribution to the welfare of the indoor sow and it is remarkable that NAWAC has failed to consider them in its draft Code. In the week immediately after a sow's litter is weaned and the negative feedback of lactation on the hypothalamic-hypophyseal-ovarian axis is removed, a sow comes into oestrus and ovulates. The average weaning to oestrus interval is four to five days, and mating is usually complete within seven days of weaning. When the sows come into heat they start to display behaviour signs of oestrus and will attempt to mount and ride other sows. This is only possible where sows are housed in groups. Riding and mounting attempts stop as oestrogen levels fall below the threshold for oestrus after ovulation, by which time efforts to mate the sow also cease (about 14 hours after ovulation).</p> <p>The consequences of oestrus behaviour for sows indoors that are invariably housed in pens where the floor consists of concrete and slats is extremely stressful and traumatic: this is the one occasion where you literally do hear sows screaming on a pig farm and where a significant number of terminal musculoskeletal injuries occur. On some indoor farms where sows are weaned into groups, more than 50% of sow wastage can be attributed to this short period, and on farms where stalls have been introduced to manage this issue, I have observed significant reduction in sow mortality. There is no question that the use of stalls over this short period greatly enhances sow welfare. Consequently, irrespective of what NAWAC decides now and into the future, I will continue to recommend to farmers I consult to that they use stalls over this short period. To do otherwise would be contrary to my obligations as a veterinarian. This position is imminently defensible.</p> <p>I strongly urge NAWAC to recognise mating stalls as a distinct housing area on the farm and to distinguish these from dry sow stalls. I further strongly urge NAWAC to not only approve but recommend their use as best practice for the period of oestrogen dominance immediately post-weaning and until ovulation has occurred. A potential Minimum Standard might read: "Sow stalls may be used for the purposes of housing oestrus sows after weaning for a maximum of 14 days." Note that no farmer will use such stalls for longer than is necessary (in most cases 7 days), as they know that any movement of the sow to alternative accommodation should occur as soon after mating, but post-oestrus, as is possible i.e. while the developing embryos are still in the oviduct. Should NAWAC choose to</p>	
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				prohibit the use of stalls for this purpose, it will not have acted in the interests of animal welfare and may find itself in an indefensible position.	
385			228	The sows are removed after 24 days from the farrowing crates and are in stalls for one week for mating which better manages stress at weaning and makes for ease of handling and mating for both sows and staff The sows are then returned in their groups to their open straw based pens for their gestation period (115) days.	Noted
385			273	The cost of bare land is so high in the Bay of Plenty that outdoor pig farming struggles to pay the rental needed to lease it. So over the last five years I have been gradually moving my dry sows from the fields into large plastic covered deep litter barns. That was completed two years ago and now all my dry sows are group housed during gestation, except for the first week after weaning. Weaned sows still run outside until they are mated, usually for one week.	Noted
385			299	The Draft Code should be amended to make it clear that in addition to the use of stalls for up to 4 weeks after mating during any one pregnancy, stalls may be used for up to 1 week after weaning prior to mating. Stalls are currently used on indoor farms for a brief period (around 1 week) immediately following weaning prior to being mated. When sows come onto heat and are housed indoors in groups they will mount and ride each other. The use of stalls for this brief period of time around mating is almost universal within the industry because it allows good operator control at a time when sows and boars are regularly being handled and hormonal aggression is at its height. A ban on the use of stalls that included stalls for mating would be completely unjustifiable.	Noted and Agree. MS added
	5.2 Dry sows				
389		Intro.	193	When talking about confinement in its review NAWAC discusses 'normal behaviours (good and bad)'. However the bad behaviours described are brought about or intensely amplified and influenced by the pigs being confined. Bad behaviors such as aggression amongst sows are very much influenced by the pigs' living environment and can be managed through improvements to this living environment. This means that NAWAC is wrong when it talks about high levels of aggressive behavior as being 'normal bad behavior' because these are directly related to the pigs being farmed in such a restrictive, unnatural and stressful manner. This high aggression amongst pigs is a symptom of cruel farming practices. The best way to deal with the high levels of aggression and other bad	Disagree

				behaviours is by addressing the causes of these. The major causes are too many pigs in too little space, with not a lot to do, and no comforts.	
392		Intro.	180	There are two times when stalls are used: between weaning and mating when oestrogen is dominant and sows experience heat; during gestation between mating and transfer to the farrowing facility. I have worked extensively and on a daily basis with sows housed in stalls for mating, in stalls for various portions of gestation, and without any stalls – both indoor and outdoor. I believe I have some understanding of how sows tolerate these different housing systems. This understanding is based on my own direct observations of sow behaviour, sow demeanour, sow health, sow longevity, and sow performance. I am also familiar with the arguments for and against stalls and have endeavoured to keep up to date with the literature relating to these.	Noted
393		Intro.	178	We reiterate concerns about the description of foetal survival as a “welfare benefit” given that at this early stage in pregnancy the embryo is not an animal under the Animal Welfare Act 1999 and not sentient. Foetal survival is an economic issue.	Agree, wording changed
402		Intro.	178	We are concerned that the focus for managing dry sows is again on the use of dry sow stalls. One could be forgiven for thinking that this was the only method available for managing dry sows, as apart from the token sentence “Alternative systems are available for managing these problems” (which seems curiously placed and gives no detail as to what these systems might be), this is all about dry sow stalls despite the fact that half the sow population is managed differently. The welfare concerns about these systems e.g. dealing with aggression in group housing situation, should be dealt with in this section.	Agree, information added
404		Intro.	35	Pigs, like many species, are social animals: they like to be in groups. Like humans you get bully’s and there does need to be some control over areas like gestation and mating but good husbandry farmers would automatically sort out these problems.	Agree
407		Intro.	228	Our sows through their gestation period are housed in open sided barns and are free to move around in their groups. Their bedding is straw coming from our own crops, making this a viable option and works well. Each large pen has an area of concrete where the animals eat and drink. After each batch of sows leave their open pens for farrowing, the straw is removed — composted and spread back to the paddocks as fertilizer for the next grain crop.	Noted

409		MS 12	24	<p>Internationally, scientific research has shown that sows in close confinement systems suffer from an array of welfare problems; both physical and psychological. Instinctive exploratory, foraging and maternal behaviours are severely restricted and frustrated in stalled and crated sows. Abnormal behaviours in the form of stereotypes characteristically result. Compulsive bar chewing along with repetitive head and tongue movements have been observed consistently in many studies. Sows in close confinement systems also typically suffer from lameness, leg weakness, over-grown hooves, urinary tract infections, cardiovascular disorders, skin abrasions, inflammation of the joints, chronic stress, abnormal inactivity and depression.</p> <p>Scientific studies have shown that sows react adversely to stalls. If given the choice, sows will avoid confinement preferring social interaction with other sows over social isolation. Research has also revealed that the barren and artificial environmental conditions that are characteristic of dry sow stalls result in a significant degree of stereotypical behaviour. Stereotypes in confined sows have been shown to result from the frustration of the strong instinctive drive to carry out foraging, exploratory and investigative behaviours. Again, the dry sow stall is a close confinement system which clearly frustrates the purpose of section 10 of the Animal Welfare Act 1999 as natural behaviours are prohibited and warped in such systems.</p> <p>Section 73(3) of the Act allows for recommendation of minimum standards that do not fully meet the obligations of section 10 in „exceptional circumstances.. Critics refute that there can be no exceptional circumstances for continuing to allow dry sow stalls to be used at any stage of the sow's pregnancy (ARLAN, 2001). The list of countries which have successfully banned dry sow stalls while introducing new, more welfare friendly systems, grows year by year European countries are moving also towards a complete ban. These factors indicate that a ban on dry sow stalls is far from extraordinary and in fact has been shown to be wholly possible with the alternative farming methods available proving to be economically successful as well as complying more fully with animal welfare legislation. If exceptional circumstances can be claimed as legitimate in a situation such as this, it follows that the Animal Welfare Act 1999 becomes inexorably defunct. It then becomes possible for Codes of Welfare to be so inconsistent with the clearest provisions of the Act that</p>	Disagree
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				the statute itself becomes virtually irrelevant. This situation palpably undermines the purposes of the Act and contravenes section 73(1)(a). (References cited in submission)	
409		MS 12	65	<p>Section 4 (c) of the Act "Opportunity to display normal patterns of behaviour"</p> <p>(d) "Physical handling in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress"</p> <p>Section 9 outlines the purpose in the care of animals pertaining to their welfare in accordance with (2) (a) (i) good practice</p> <p>(2) (a) (ii) scientific knowledge</p> <p>Section 73 (1) and (2) outlines the matters that NAWAC must consider and in particular 73 (1)(a) "Be satisfied that the proposed standards are the minimum necessary to ensure that the purposes of the Act will be met". In relation to the use of dry sow stalls or group housing of sows I do not see that NAWAC is acting within the terms of the Act by including aspirational statements. Whilst accepting that stalls inhibit a pig from exhibiting some normal patterns of behaviour, group housing, in the period of very early pregnancy and when first mixed, frequently causes unnecessary pain and distress. It is my understanding that NAWAC has not been given the responsibility, in the Act, to adjudicate between various negative features of animal welfare. Therefore minimum standards and recommendations for best practice must, in line with section 73 (2)(b), reflect what is regarded internationally as good practice.</p>	Noted
409		MS 12 (a)	21	Minimum sizes of stalls. This is appalling considering that the present size of the enclosures allows no room for movement apart from standing and lying. It will lead to even worse cramped conditions for already beleaguered pigs. I ask NAWAC to not consider such a retrograde step.	Disagree
409		MS 12 (a)	61	The draft code is now outcome –based rather than a prescriptive code, which could well see animals being kept in even more cramped conditions than they already are. Instead of specifying minimum sow or farrowing crate sizes that pig farmers must legally adhere to, it is replaced with more generalised comments regarding the animals' physical and behavioural requirements. Considering farmers have allowed the ongoing severe confinement of sows I fail to see how NAWAC 'S thinking of relying in good stockmanship , will work in favour of the well being of the pig. (which makes the removal of specified minimum sizes of sow and farrowing crates very scary and a total retrograde step in pig welfare).	Disagree

409		MS 12 (a)	62	Again, any solitary confinement facility should be large enough for the individual animal to turn around and walk about (even if a small distance). Sow crates, like farrowing crates amount to a severe physical constraint that would be considered inhumane in any other context. There is nothing so extraordinary about pigs that a special exemption from humane treatment should be permitted.	Disagree
409		MS 12 (a)	67	In the Draft Code NAWAC has made some recommendations for the sizes of crates. We DO NOT accept that these in any way will ease the discomfort and distress that pigs suffer in this cruel confinement.	Noted
409		MS 12 (a)	123	There is no provision for turning around, rooting and dunging away from bedding. These requirements are crucial to allow sows to fulfil essential needs.	Disagree
409		MS 12 (a)	133	Whilst the reduction of time to be spent in dry sow stalls is and improvement, I suggest that it should be also become mandatory to increase the size and comfort of these methods of confinement until phasing out occurs.	Disagree
409		MS 12 (a)	146	The size of the sow stalls should be determined with actual measurements that will allow the largest of sows room to lie and stand comfortably without contacting any side of the stall.	Disagree
409		MS 12 (a)	173	We also approve of the requirement that sows be able to lie down in such a way that they do not interfere with each other – something which is not possible in the presently allowed sow stalls (Fig. 1 included in submission). In order for this to be achieved however, it is necessary that the space allowance be greater than that given by the Spooler formula. SAFE recommends a space of at least 3.6 square metres per sow for sows in group housing.	Disagree
409		MS 12 (a)	198	In relation to Minimum Standard 12, I agree that the ability of sows to lie down comfortably in stalls should be part of the minimum standards, as animal welfare investigations have revealed that some pigs cannot even lie down in the stalls they are currently housed in.	Noted
409		MS 12 (a)	219	Why have the specifications for minimum sizes of sow crates been removed?	Disagree
409		MS 12 (c)	4, 5, 7–10, 12, 14, 20, 23, 31, 33, 39,	According to the economic analysis of MAF, only 18 of the roughly 360 farms in New Zealand currently use sow stalls for a period greater than four weeks. Section 73 of the AWA only allows for a reasonable amount of time for a transition period. 2 years is clearly too much, given that these handful of farmers have chosen to not keep up with changing New	Disagree

		43, 44, 47, 69, 71, 80, 89, 92, 95, 99, 101, 111, 113, 114, 119, 123, 128, 129, 131, 132, 143, 144, 155— 158, 165, 169, 170, 179, 184, 187, 191, 194, 207, 208, 213, 220, 222— 227, 229, 233, 235— 238,	Zealand values. Please bring forward the 31 December 2012 date to June 2011 (or 2010 in (No. 4, 39, 43, 101) some standard letters) or 31 December 2011 (80, 208, 213, 233, 235–238, 243, 264, 277–296).	
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			243, 250, 252, 254, 264– 267, 277– 296, 307,		
409		MS 12 (c)	24	The draft Animal Welfare (Pigs) Code of Welfare 2009 allows confinement to the dry sow stall for the first four weeks of pregnancy from 2013 which is effectively a phase down of stall use rather than a phase out. Such confinement, for any length of time, does not allow the sow to express natural patterns of behaviour thus contravening section 10 of the Act (ARLAN, 2001). This minimum standard is extremely difficult to enforce and monitor, causing a true phase out of the dry sow stall to be undermined (ARLAN, 2001; Sankoff, 2005).	Disagree
409		MS 12 (c)	40	I would like to see the use of dry sows stalls phased to only 4 weeks per pregnancy by 2012.	Disagree
409		MS 12 (c)	66	Sows can be crated for their entire lives up to 31 December 2012 taking into account that they are also confined to farrowing crates. The Green Party requests NAWAC to bring the December 2012 date forward to June 2011.	Disagree
409		MS 12 (c)	67	Limiting the amount of time sows spend in stalls is not enough. Imprisonment is imprisonment. Pigs have little concept of time and do not comprehend that their incarceration is for a finite period. They simply awake and are imprisoned, unable to function normally, interact and socialize, or raise their young as nature intends. It is no wonder that pigs' behaviour and emotions deteriorate when confined in this way.	Noted
409		MS 12 (c)	142	Bring the date forward to 31 Dec 2011. Pig farmers using dry sow stalls have had sufficient notification that changes were on the way - a Green Party initiative in 2005 should have demonstrated to farmers where the future lay. A significant proportion of farmers do not use stalls at all (they are banned in several countries, including the UK), which indicates adequate management of sows through the period where aggression may be a problem is eminently achievable.	Disagree
409		MS 12 (c)	146	I would prefer the Minimum Standard came into affect as soon as the	Disagree

				<p>Code is passed, or 31 December 2010.</p> <p>Since the MAF's economic analysis report suggests that there is unlikely to be a significant or measurable impact from bringing forward the four week restriction on dry sow stall use for all farms from 2015 to 2013, it should also be equally unlikely that there would be significant or measurable impact from bringing the restriction forward to 2011. This is what I am calling for above because the animals that are in existence now need protection and better welfare standards, not only the future generations.</p>	
409		MS 12 (c)	166	<p>With the use of sow stalls for four weeks after mating, the mixing of sows into groups can be minimized to once per gestation cycle. This will have the advantage of minimizing the stress to a newly pregnant sow. Research confirms that there are benefits in the use of sow stalls for this initial period for the welfare of the sow and her unborn litter. On the other hand, a total ban on sow stalls will make this much more difficult to achieve as newly weaned sows are often in a weakened state and much more prone to injury, stress and miscarriage. Without stalls a sow is likely to be regrouped several times, each time exacerbating the stress. Sows are also much more aggressive at this early stage due to hormonal influences.</p>	Noted
409		MS 12 (c)	173	Section (c) repealed.	Disagree
409		MS 12 (c)	175	<p>We currently use both sow stalls and loose sow accommodation for housing pigs. Stalls are used from weaning to approx 42 days post mating, the sows are then moved to loose housing for the duration of there gestation. We have found that the crate provides the best protection and care for the sow. The compromise to the animal is restricted movement. For the last 12 months we have been tracking at 9.7% return rate for mated sows and 79.8% farrowing rate for sows. We scan all sows to confirm pregnancy before moving them to loose housing. Therefore 10.5% of sows do not hold pregnancy whilst in loose housing. Additionally we also have to remove sows due to injuries from fighting, bullying and poor condition (due to competition for feed). Unfortunately I do not have a report to account for the sows returned to stalls due to bullying, but would estimate it to be at least 5%. Unfortunately some of these animals also require euthinazing due to there injuries, which is never a pleasant task and a waste of a previously good animal.</p> <p>The change to 4 weeks in stalls post mating means we will need to build a new building to meet the space requirements. The speed at which we can</p>	Noted

				do this is going to depend on how long it takes to find a design that provides the best possible productivity, resource consent processing, construction time and importantly when schedule/profitability allows. This would have to be on at least a 5 year time scale to allow finances to plan and fund such a facility.	
409		MS 12 (c)	178	The NZVA supports this MS unequivocally	Noted
409		MS 12 (c)	180	<p>Dry sow stalls come with pros and cons, as do group housing systems. Unfortunately stalls elicit a lot of emotional anthropomorphic concerns amongst the public, based largely I suspect on the restriction the stall places on the sows ability to move, most notably to turn around, and the association humans make between confinement and punishment. Were the pig able to express its view, however, I am not convinced that it would share these concerns as from my experience pigs do not prioritise the freedom to move above other freedoms, such as freedom from aggression, access to feed, and personal space, whereas by virtue of its stated intention to prohibit the use of stalls in the future, it would appear NAWAC does.</p> <p>The “pros” of stalls are not constant throughout the reproductive cycle, and appear to be limited to the first trimester when the pregnancy becomes established. That these “pros” are very real in early pregnancy and then wane, is the very reason the advantages of stalls to the pig farmer are also almost entirely limited to this period. When all of the freedoms are considered, the pendulum swings in favour of increased mobility after about four weeks of gestation. This corresponds with a stable hormonal state (the progesterone-oestrogen story). For this reason I do not condone the continuous confinement of breeding sows and do not support the use of dry sow stalls for all of gestation i.e. I fully endorse and embrace Minimum Standard 12 (c).</p>	Noted
409		MS 12 (c)	198	I support reducing the amount of time that sows can be confined in stalls to four weeks after mating. However, I think this requirement should be brought in much sooner than 31 December 2012.	Disagree
409		MS 12 (c)	204	<p>Aspects of the code that this submission supports: The restriction of confinement in dry sow stalls to not more than 4 weeks after mating after December 2012, although not this time frame.</p> <p>Aspects of the Code that this submission opposes: Any date beyond when the new code comes into force for the confinement of mated sows and gilts for more than the first 4 weeks after mating.</p>	Disagree

				Substantial list of reasons given in submission.	
409		MS 12 (c)	234	I need tools like dry sow crates, to make it easier and better for the animals well being, and future, and I feel that by restricting the use of Dry sow crates to 4-5 weeks is achievable.	Noted
409		MS 12 (c)	256	I am firmly against the practice of any medium (any longer than a few weeks) or long term containment of pigs in sow crates and have hardly bought pork in years in this country because of this.	Noted
409		MS 12 (c)	258	It is most distressing to see sows which have been fighting, with torn ears, ripped vulvas and bite marks. Sow health is so much better in stalls and crates with no fighting or bullying, they all get their required food instead of the bossy ones getting the most food and the meek less. That the use of stalls for 4 weeks after mating and during the mating period should also have no time frame, and the phase-down period for sow stalls to the above, remain as in the current code at 2015.	Disagree
409		MS 12 (c)	272	PIC agrees with NAWAC's position.	Noted
409		MS 12 (d)	1, 17, 26, 35, 37, 43, 45, 60, 74, 75, 76, 77, 87, 91, 93, 102, 107, 112, 122, 130, 139, 144, 145, 148, 154, 159, 164, 171, 174, 177,	We need an immediate ban on sow crates.	Disagree

			185, 192, 193, 196, 199, 200, 205, 206, 212, 214, 246, 247, 249, 255, 268, 302, 304, 305, 308, 313 And 13,180 postcar ds And 321 e- cards And +9 emails		
409		MS 12 (d)	2, 179, 189, 201, 231, 248. 310	I support a quick sow stall phase out.	Noted
409		MS 12 (d)	3, 140	We support the intention to eventually ban the use of sow stalls, however, we feel that 2017 is an excessive amount of time for this ban. We would	Disagree



				encourage the NAWAC to bring this date forward, instead of reducing the use of sow stalls to the first four weeks of a sows pregnancy by 2012, we would like to see the complete ban of sow stalls by the end of 2012.	
409		MS 12 (d)	4, 5, 7–10, 12, 14, 20, 21, 23, 31, 33, 69, 71, 80, 89, 92, 95, 96, 98, 99, 111, 113, 114, 119, 124, 128, 129, 131, 132, 143, 155–158, 165, 169, 170, 176, 184, 187, 191, 194, 197, 207, 208, 213, 220,	According to MAF's economic analysis, roughly 67 farms actually use sow stalls. Given that sow stalls contravene the AWA, the fact that the majority of farmers do not use sow stalls, and that a sow stall phase-out has been mentioned in previous draft codes, please bring the total phase-out of sow stalls date forward to December 2013 (or 2011 in (No.4, 21, 176, 197) (or 2012: No. 207, 208, 213, 233, 243, 281,284, 285,288–294, 296) some standard letters).	Disagree

			222– 227, 229, 233, 235– 238, 243, 250, 252, 254, 264– 267, 270, 277– 296, 307,		
409		MS 12 (d)	6, 101, 120, 186	The phasing out of sow crates is essential and urgent. I want them phased out by December 2012.	Disagree
409		MS 12 (d)	11	<p>The proposed sow crate ban should cover the entire gestation period as of December 31, 2012.</p> <p>There is no scientific evidence suggesting that sows are less prone to suffering from intensive confinement in the four weeks post-mating, or that confinement during this period is necessary for the sow's well being. Crated sows have been shown to exhibit 45 times more stereotypical behaviors than group-housed sows, and these stereotypes - like vacuum chewing on the bars of the crates - are well-established signs of stress that are as common in the first four weeks post-mating as they are at other points in the gestation cycle. Similarly, crated sows are more prone to debilitating feet and leg injuries and general body weakness that can cause acute and chronic pain - injuries that begin in the first 4 weeks of gestation.</p> <p>Sow aggression is a real concern, but one that can be minimized through good breeding. Dr. Temple Grandin, America's foremost animal welfare scientist, has argued that sow aggression can be solved through altering sow genetics rather than using crates, and she has implemented successful systems across America where sows are group housed at all</p>	Disagree

				stages of gestation with minimal resulting aggression. As Dr. Michael Appleby, of the UK's Farm Animal Welfare Council, has noted, "There are also welfare problems in group housing, such as aggression between sows, but these problems are mostly amenable to management, whereas the problems of crates and tethers are more integral to those systems." (References cited in submission)	
409		MS 12 (d)	13, 47	I oppose the use of sow crates, and call for an immediate ban on these, not a reduction in use as proposed, and not the ban coming into force in 7 years time. Only a complete ban now is acceptable, as it is in the UK, Sweden, Denmark.	Disagree
409		MS 12 (d)	15	Post-mating crating should be phased out sooner than later and certainly no later than 2017 and that crating at other times should have been phased out years ago, and that it should be phased out as soon as possible and certainly no later than December 31st, 2012.	Disagree
409		MS 12 (d)	22, 27, 29, 41, 90, 105	We oppose confining pigs in any type of crate and urge that legislation be put in place immediately to discontinue these cruel practices by mid 2011	Disagree
409		MS 12 (d)	24, 232, 242,	<p>Additionally, the draft Animal Welfare (Pigs) Code of Welfare 2009 allows for an unnecessarily long phase out period, on a scale that appears unfounded (ARLAN, 2001). The full implications of an extended phase out period for dry sow stalls by 2018 must be considered. For the term of the phase-out, this will mean that the code effectively legitimizes what is recognized as a practice which should be prima facie illegal under the Animal Welfare Act 1999 (ARLAN, 2001). An extensive phase out period makes a travesty of the Act and undermines public confidence in the ability of the statute to be enforced and administered. Section 73(3) should not be used as a generic justification for maintaining current industry parameters. Such allowances raise ultra vires issues undermining effective implementation and enforcement of welfare legislation. The present operation of the New Zealand pork industry greatly compromises the welfare of pigs and exceeds powers granted by the Animal Welfare Act 1999. In order to properly protect the welfare interests of pigs, the industry must be restructured in order to bring it within the requirements of the Act. MS be reworded to read as follows:</p> <p>(a) As of 1 January 2011, dry sow stalls must not be used.</p> <p>(b) Dry sow stalls in any new facility after the issue of this code must not be built or used to house sows or gilts.</p>	Disagree

				(references cited in submissions)	
409		MS 12 (d)	25	I think that the use of dry 'stalls' (crates) is totally abhorrent and that pig-farmers have been on notice of public feeling long enough to prepare for changes and that 7 years is unnecessarily long for phase- out. I submit that 2 years should be adequate time.	Disagree
409		MS 12 (d)	34	I believe that the use of any form of crate is unacceptable as they are extremely cruel and cause the pigs great suffering. These crates confine pigs to a very small space in which they have no freedom of movement, any reasonably minded person would realise that such conditions would cause great suffering especially for an animal as intelligent as a pig, which has similar intelligence to a dog. The crates also stop the pigs displaying their natural behaviour which clearly breaches the Animal Welfare Act. The excuse given for the use of crates, to stop aggressive behaviour, is unacceptable, any group of animals confined to a small space will exhibit aggressive behaviour. If pigs were allowed to roam freely in a large outdoor environment there would be no aggressive behaviour. All crates should be eliminated immediately. The pig industry has had many years notice that crates were not acceptable and would be phased out.	Disagree
409		MS 12 (d)	40	To phase out the use of dry sow stalls by 2018 is completely inadequate. NAWAC acknowledges that sow crates are unnecessarily cruel. I agree that businesses must be given time to transition to humane methods of pork production. But this will not affect our ability to compete in the marketplace. If we are able to brand out pork products as humanely raised, as soon as possible, this will give us a comparative advantage over the cheap products imported from overseas producers. I would like to see the practice banned by the end of 2013. This will give business time to transition and mean that the inevitable braches of this ban can be enforced within this decade. If a ban were to come into effect in 2018 it is almost certain that the practice will continue long afterwards. This is understandable when one considers the very few resources available for enforcing animal welfare laws.	Disagree
409		MS 12 (d)	46	I support eliminating sow crates/stalls for pigs. These techniques are inhumane and are worse than imprisonment of people – carried out as a punishment for wrongful acts. What was the pig's wrongful act that leads to this excessive punishment?	Noted
409		MS 12 (d)	61	Support the acknowledgement from NAWAC that sow stalls must be phased out and in so doing finally acknowledging the Animal Welfare Act.	Noted

				<p>Oppose for the next three years thousands of sows will continue to suffer in sow and farrowing crates for their entire lives. From 2013 sows can be confined in sow and farrowing crates for up to 20 weeks per year until 2018.</p> <p>Carter on 20 July in a speech to the New Zealand Pork Industry Board conference warned the industry that consumers expected action, and said that “this issue ain’t going away any time soon.” He said that he would not pre-empt the current review, but personally believed that a 2015 date for action on stalls “needs to come forward significantly.” Such statements create a strong expectation that the outcome of the current review process will be a ban on the use of stalls in the near future. There is no requirement at all for further research or reports. There is ample New Zealand and international material already.</p>	
409		MS 12 (c) & (d)	62	<p>Firstly, sows should not be confined in sow stalls (as currently designed) at all. Short-term isolation early after mating could be achieved in individual pens that would enable the pigs to turn and walk about. Sow stalls should be phased out within a year of this Code coming into force. The industry has known this is the direction it must go in for years and so cannot justify a longer phase out. Allowing the continued use for 4 weeks per pregnancy from Jan 2013 to Dec 2017 just postpones the time when operators need to make the changes that are actually required. It is better that the investment in new systems are made once and sooner.</p> <p>If it takes higher skill in stockmanship then make that a requirement for working with pigs – that stockmen need to be able to manage the interactions between animals at all life stages.</p>	Disagree
409		MS 12 (d)	66	<p>Sows will still be crated for up to 20 weeks per year, taking into account that sows are also confined to farrowing crates. Fewer than 67 farms use sow stalls. The pork industry has known for many years that sow stalls do not fully meet the obligations of the New Zealand Animal Welfare Act (AWA). Phasing sow stalls out over a seven year time frame is therefore unreasonable, as it would allow a practice that breaks the law to continue for too long.</p> <p>The Green Party requests NAWAC to phase out sow stalls by December 2013.</p>	Disagree
409		MS 12 (d)	67	<p>NAWAC has conceded that crates and stalls should be banned at some point in the future. We are in agreement, except that the time to ban crates is now, with this review of the Pig Code of Welfare. If crates are not a good</p>	Noted

				idea for some point in the future, they are not a good idea now. We accept that pigs can be aggressive. Especially when overcrowded, mothering their young or when competition for food is high. Where pigs are raised in natural environments, aggression seems not to be a significant factor. In the bush of NZ pigs are flourishing. Obviously they do well without crates in the wild where they have enough space and freedom. For the sake of the pigs: Say "NO" to crates and stalls!	
409		MS 12 (d)	68	Given the inhumane way that they raise pigs, the only phase out period should be the time it takes engineers to dismantle the crates. Nothing less is acceptable.	Noted
409		MS 12 (d)	72	We are asking for sow crates to be banned within the next year. How is it acceptable to allow sow crates to be continued as good practice for years to come?	Disagree
409		MS 12 (d)	73, 79, 81, 83, 100, 104, 106, 118, 121, 125, 136, 137, 149, 150, 151, 160, 162, 167, 168, 195, 202, 244, 311, 312,	I ask that Sow Crating be banned.	Noted
409		MS 12 (d)	84	The chair of NAWAC has stated (in press release): "In the case of dry sow stalls, the situation is less clear-cut. There is no strong scientific evidence	Disagree

				<p>for a preference to any other commercial production system, nor is there strong evidence for sow stalls to be preferred over others on welfare grounds. Because of this, NAWAC has taken consideration of societal expectations and analysis of economic impacts in proposing a future ban". This statement is incorrect. It has been well established in the scientific literature since 1997 that sow stalls produce pathological "stereotype" behaviour. More recent research has confirmed common sense observations that sows are being driven insane. Sows are kept in stalls to maximise profit and because of the low skill base of piggery husbandry staff. The latter can be addressed in the Code by Minimum standard no. 1, requiring better training.</p> <p>I commend NAWAC for finally recommending a phase out of sow stalls. My submission is that sow stalls should be banned from 31 December 2012, or earlier if possible.</p>	
409		MS 12 (d)	88, 97,	I agree that dry sow stalls must be discontinued.	Noted
409		MS 12 (d)	115, 219	We feel that the total banning of stalls should be ratified at a much earlier date	Disagree
409		MS 12 (d)	123	<p>Ban on dry stall use should be implemented as soon as 2012, especially if the above requirements have not been met. There are alternative systems available and these are already used by the majority of commercial pig farms in New Zealand. The Draft Economic Analysis indicates that more than half of commercial pig farms have moved away from dry stall systems. The economic impact of ban on dry stalls is moderate and likely to affect relatively small number of farms.</p> <p>Note: A frequently given reason for keeping sows caged is the increase in aggression during pregnancy and lactation. Pigs are highly social animals and have evolved a sophisticated social structure and complex communication system. They form stable family groups with robust hierarchies. The role of a hierarchy is to decrease aggression in the group and provide a stable social environment. There is very little aggression among sows when pigs are kept in stable family groups with adequate space and sufficient access to resources. Aggressive events occur mainly when one sow moves up the social rank order and these events are short lived, and have minimal negative impact on litter.</p>	Disagree
409		MS 12 (d)	134	<p>A total ban on sow crates by 2013. No interim step.</p> <p>It is undeniably dry sow stalls in any stage of a sows gestation does not allow her to perform natural behaviours, such as rooting ground material</p>	Disagree

				<p>and natural movement. It has been proven slated and concrete floors will increase tail biting and injuries such as skin and shoulder lesions, lameness, inflammation of the joints and hoof injuries. Sparse barren settings lacking bedding and an environment to display natural behaviours will lead to chronic stress, repetitive abnormal stereotypic behaviour and increased aggression later in life.</p> <p>Alternatives: Indoor group housing for pregnant sows. Successful group housing does not refer to close confinement or intensive group housing. To apply successful group housing to pregnant sows firstly requires experienced stockmanship skilled in temperament and social selection, allowing social bonding of a herd. In smaller groups a stable system can be used where sows are not mixed throughout their pregnancy term, with larger groups it usually becomes a dynamic system where sows can be added weekly. Sizing depends on the amount of pigs housed in a group. More importantly the size must be large enough to let pigs in the group perform natural behaviours. Sizing should be SPCA approved and subjected to audits.</p> <p>With a conversion to group housing from current systems, it is expected some sows that have been confined to crates most of their lives will show higher dominant behaviours if suddenly moved into generous group housing, but through responsible stockmanship, sows bought up with the new system will adapt to these social conditions and aggression and welfare will be ultimately reduced. According to the QAF Meat Industries in Australia, welfare concerns with group housing decrease and lead to advantages of improved body condition, reduced leg and feet problems and ultimately create better immunity and productivity.</p> <p>Concerns with food and water are also dismissible with correct management of eliminating competition at feeding time through (EFS) Electronic Feeder Systems, trickle feeders; free access feeder stations or dump feed systems. Pig farmers in Europe have also recorded improved management systems through being able to move freely amongst stock for inspection.</p>	
409		MS 12 (d)	138	<p>Draft MS 12 fails to meet the statutory requirements and purposes. There is ample and well recognised evidence (which need not be repeated here) that to confine a pig in a dry sow stall for extended periods, where its only permitted movement is to stand up of lie down, leads to: serious behavioural problems such as stereotypies, unresolved aggression,</p>	Disagree



				<p>depression, unresponsiveness, and distress; and serious health problems such as leg weakness, deformities, inflammation, cardiovascular problems, reproductive problems, and other clinical conditions.</p> <p>As stated above, because the draft new minimum standard does not even contain the current 4 week restriction in relation to stalls built post-2005 many thousands of pigs will be permitted to be confined in stalls for most of their lives, at least until January 2013. After that, they will still be confined for continued lengthy periods until a date to be determined (unlikely to be before December 2017).</p> <p>It is submitted that this management system completely fails to meet the obligations in section ss 10, and also constitutes ill-treatment of animals in breach of ss 29(a) &amp; (h). It is also inconsistent with the welfare purposes of the Act. In the Draft Code (p 22), the Committee itself acknowledges (as it inevitably must) that the “use of dry sow stalls does not fully meet the obligations of the Act”. That non-compliance has been continuing for many years now.</p> <p>The time frames for the introduction of the 4 week restriction (over 2½ years away), and of the proposed ban in December 2017 (over 7 years away) do not ‘cure’ the non-compliance with the Act, but rather ensure that the noncompliance is continued for an unacceptably and unjustifiably prolonged period.</p> <p>It is submitted that either (a) the 4 week restriction should be introduced immediately (upon the Code coming into effect) and the ban within a very much shorter time frame than proposed, or (b) there should be an immediate ban.</p>	
409		MS 12 (d)	142	<p>I would propose 31 Dec 2012. Reasons: Pig farmers using dry sow stalls have had sufficient notification that changes were on the way - a Green Party initiative in 2005 should have demonstrated to farmers where the future lay. A significant proportion of farmers do not use stalls at all (they are banned in several countries, including the UK), which indicates adequate management of sows through the period where aggression may be a problem is eminently achievable. A period is required for farmers to learn new management techniques, but these are not major shifts in</p>	Disagree

				operations – the change-over period does not have to be long.	
409		MS 12 (d)	146	I agree with this preferred option to phase out dry sow stall use altogether, however 2017 is an unacceptable time to wait. According to the draft economic analysis the impact on the industry (in terms of industry exits, decreased production, higher consumer prices) is slightly less when using a 2017 phase-out as opposed to a 2013 phase-out. However, in my opinion, the impact of the 2013 phase-out is perfectly acceptable, and in fact the estimated percentages of decrease of the number of farms and production volumes are negligible. One of the Key Model Assumptions driving the 2013 results are that producers will lose many consumers when passing on cost increases. Personally I do not believe that will occur because pork will remain a competitively priced protein in comparison to other options, such as chicken, beef, lamb and fish. An increase of pork prices by 4.4 to 4.7% is passable and can occur even without the industry changing its farming methods. But in any case, retail prices should be expected to reflect the cost of farming, just the same as beef and lamb meat is expected to reflect the cost of farming and does so. It is up to the market to meet the cost of correct welfare, not the other way around, where the animal welfare is compromised in order to meet market demand. I for one, will be more than happy to pay a further 4.4 - 4.7% to ensure the pork I purchase is well raised and protected by an adequate code of welfare. Even if a reduction of consumer demand does occur as a result of higher prices, this should fit approximately with the decrease in production and effectively cancel out much of the impact. A natural fit should evolve. On the other hand, the number of sows in stalls from 2013 would be zero, which is the ideal outcome. After all, the Code of Welfare for Pigs should have the pig's actual welfare as the number one priority, over and above concerns for the consumers and the farmers. Therefore the 2013 phase-out date is the best of the suggested options, please change the recommendation.	Disagree
409		MS 12 (d)	166	Our farm does not have the scope to construct comprehensive group housing facilities if sow stalls were to be totally banned. In this circumstance, we would seriously consider closing our pig farm operation.	Noted
409		MS 12 (d)	173	Safe opposes the use of sow stalls Key welfare issues with references cited are given in submission. In summary: As part of their submissions on the 2004 Code of Welfare, both SAFE and	Disagree

				<p>the RNZSPCA reviewed a number of research publications that concluded the use of sow stalls compromised animal welfare in an unacceptable manner. Sows in stalls cannot exercise, which results in weak bone structure, joint damage and high mortality. These considerations should be sufficient in themselves to trigger a ban in any country concerned about animal welfare, but the physical health effects are less significant than the emotional trauma caused by keeping intelligent animals in barren, cramped conditions, where they cannot express any normal patterns of behaviour. This stress is manifested in repeated, destructive, “stereotype” behaviours, such as bar biting and tongue rolling. As a result of the SVC recommendations, the European Commission allowed sow stalls for only the first four weeks from 2012. Sweden, the United Kingdom, Switzerland and the Netherlands have gone further and banned sow stalls. Sow stalls will be banned in Denmark from 2014. The United States of America states of Oregon, Maine and California are phasing out the use of sow stalls for animal welfare reasons.</p> <p>NAWAC however has stated that they do not support phasing out sow stalls until alternative systems can be put in place that “deliver better welfare outcomes overall...at a practical and economic cost”. The issue of cost will</p> <p>be dealt with under our discussion of the draft Economic Analysis, but concerning the provision of better welfare outcomes, it is SAFE's position that free range and alternative indoor systems already provide better welfare outcomes. Alternative systems already provide better welfare is discussed further with references cited in submission. In summary: The causes of aggression in sows are multifactorial, but several practical ways of preventing aggression in mixed housing include eliminating overcrowding, not mixing pigs from different litters, providing straw or other bedding material, and providing sufficient food that not only meets nutritional needs but satisfies the appetite. Bored, hungry, stressed and frustrated sows – like humans in the same conditions – are more aggressive. It appears therefore that farmers' supposed concern is related solely to the valuable and vulnerable newly developing fetuses. In other words, their considerations are purely economic. A recent study commissioned by the New Zealand Pork Industry Board has tried to make a case for welfare benefits of sow stalls. However, it bases its argument purely on reproductive performance of the pigs. This is not considered a</p>	
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				<p>reliable indicator for assessing animal welfare for several reasons. Firstly, the advent of selective breeding means that animals have been genetically programmed to reproduce regardless of the cost to their own welfare. Secondly, the use of prophylactic antibiotics means that animals can continue to put on weight and perform, even when under extreme stress. The urge to reproduce in our own species and others, is a basic biological instinct that is not influenced by the wellbeing of the producer. For these reasons, animal welfare scientists generally rely on a variety of indicators, including anatomical and physiological studies, behavioural preferences and observations of behaviour when assessing welfare. Further evidence that sow stalls are not required to manage aggression comes from the New Zealand Pork Industry Board's own studies, as cited in the draft Economic Analysis, showing that most farmers do not use them. NAWAC has given no indication that these farmers are harming the welfare of their pigs, nor is there any evidence that this is happening. There is also no evidence that the welfare of sows in the United Kingdom, Sweden, Switzerland, Finland or the Netherlands is in any way compromised.</p> <p>In conclusion, The NAWAC argument that sow stalls are required to prevent aggression is fundamentally flawed. The Economic Analysis suggests some inconvenience for a few pig farmers, but not an economic crisis. NAWAC has been signalling since 2004 that sow stalls are unacceptable and may be phased out, so stall farmers have had plenty of warning and opportunity to move into alternative production. It is not the business of the government to prop up inefficient or immoral businesses that cannot or will not adapt their production method to ways the public find acceptable. It is because NAWAC has been signalling a phase-out of sow stalls, that we consider the long phase-out times of 2017 and 2023 far too generous to the industry. There is no reason why any competent business could not arrange a phase-out within five years. Since NAWAC has signalled their intent to phase out sow stalls since 2004, the early proposed time of December 2013 is the most acceptable option.</p> <p>Sections (c) and (d) are repealed. The following sections are to be added:</p> <p>(g) No new sow stalls are to be built after this code comes into force.</p> <p>(h) Confinement in dry sow stalls must not be undertaken from 31 December 2013.</p>	
409		MS 12 (d)	174	Over the last six months we have been looking at alternatives to stalls, to date I can not find a loose sow arrangement that can demonstrate the	Noted

				overall welfare and productivity benefits that the stall provides.	
409		MS 12 (d)	178	The NZVA acknowledges that there are welfare advantages and disadvantages to the systems available for managing housed dry sows in current systems (management in outdoor systems is not specifically covered by the code). Consequently we consider neither system to be preferred or ideal, and that neither can necessarily be considered superior to the other. At this point, however, there are differences in opinion about how to solve this problem. Those veterinarians within the industry tend to feel the decision to favour one system over the other is based on anthropomorphic selective and subjective prioritisation of the animals' needs and public sentiment rather on science and the net welfare benefit, while others agree with the NAWAC policy that a close confinement system must confer demonstrable and significant welfare benefits to be preferred over group housing.	Noted
409		MS 12 (d)	180, 181, 217, 221, 230, 239– 241, 245, 271, 314	I'm against factory farming of pigs – sow stalls	Noted
409		MS 12 (d)	190	The proposed complete prohibition of dry sow stalls in future suggests that they will not be permitted to be used for mating or for the first four weeks of gestation (as provided for in MS 12c until the end of 2012). While I appreciate that sows can be successfully farmed indoors without any dry sow stalls as I service a number of such farms, I do not believe that this system is preferred even though with good management and stockmanship it can provide equivalent welfare to that of a short-term (4-week) stalled system. Of course not all facilities are the same, and some systems without stalls are clearly better than some with stall, but the opposite is also equally true, especially when management or stockmanship are suboptimal. Essentially, both my own view and that of the relevant literature is that no one system is clearly better than the other for housing of sows for the first four weeks gestation, although the public	Noted

				strongly disagrees. However, public opinion on this matter has largely been formed on misleading and mischievous information that has sort to depict the sow stall as evil. This it is not. To suggest that sows “suffer” in a sow stall is demonstrably ignorant – unless sows have a preference for suffering i.e. sows given access to free-access stalls typically elect to spend the majority of their time in the stall component. As a result, I am concerned that NAWAC intends to prohibit the use of dry sow stalls for sentimental reasons rather than an objective assessment of welfare, although I am aware of the political and societal pressure that NAWAC is under to do this. Should NAWAC pursue this course of action, they must do so with an awareness that in some instances the welfare of the animals this Code is supposed to protect will be poorer for their decision.	
409		MS 12 (d)	198	I support phasing out sow stalls completely, but I do not think it should take until December 2017 to do so. I agree that some transition time should be permitted, so that the pig farming industry is not subjected to requirements that would financially ruin some farmers – that would not be a positive thing for the welfare of their pigs. However, allowing the lengthy transition period proposed in the Draft Code seems to unjustifiably protect the pig farming industry at the expense of pig welfare. Until sow stalls are phased out, sows will continue to suffer the consequences of confinement. I think that sow stalls should be phased out by the end of 2013.	Disagree
409		MS 12 (d)	204	Aspects of the code that this submission supports: The statement of intention to outlaw dry sow stalls, although not the proposed time frame. Aspects of the Code that this submission opposes: Any date beyond 2 years for the phase out of confinement in dry sow stalls.	Disagree
409		MS 12 (d)	211	We are very disappointed with the desire of NAWAC to do away with sow stalls. Ironically none of the three recognised specialist pig vets endorse the stance of the Draft Code despite the different backgrounds of them all, one of whom was a past Regional President of the SPCA for 10 yrs and a Life Member and another openly declared his abhorrence when he first saw sow stalls only to find when he came to understand all of the issues that the stall was the best overall tool to manage welfare. Their extensive experience and observation has led them to conclude that from a welfare perspective that they wish the ongoing use of stalls, even if it is only for the first four weeks of pregnancy. My own 31 years of experience totally endorses their view. Unfortunately the Draft Code does not enhance the welfare of sows and we are extremely angry that NAWAC appears to be	Disagree

				<p>more interested in bowing to uninformed public sentiment than it is to caring for the welfare of sows.</p> <p>There is a wealth of informed opinion that banning stalls is a bad thing. References cited in submission.</p> <p>NAWAC claims that it has briefly provided techniques to reduce aggression while giving pigs an opportunity to express a greater range of behaviours. One such example is the use of boars to manage aggression in group housed sows. This technique has short lived (reference cited) Personal experience with this technique clearly indicates that some boars simply don't want to get involved in aggressive encounters between sows and they simply find a quite part of the pen to escape the turbulence.</p> <p>Unfortunately NAWAC has also concluded from the reduction in the use of stalls in the NZ industry over the last 6 years that the industry agrees with a ban on stalls and so it is fair to discontinue their use. The trend is purely an economic response when making investment decisions due to future uncertainty over welfare codes. Given that stalls is an expensive way to house sows no farmer is going to invest in something that will soon be outlawed. We wish to remind NAWAC that stalls are one of the most expensive means of housing sows and group housing even with electronic sow feeders is cheaper For a farmer to choose stalls despite the additional cost of doing so should indicate that welfare is a big part of their decision especially with evidence that farmers who installed electronic sow feeders (ESF which are a modern attempt to remove sows from stalls) are pulling them out in Europe and returning to stalls.</p> <p>FreshPork Farms Ltd is therefore against any date being given for the cessation of stalls. We would be happy to support the same approach taken for Minimum Standard No. 11 in "NAWAC comment for public consultation" that the desire to remove stalls is preferred but only when a suitable alternative is found. NAWAC affirms this stance by declaring in "NAWAC's conclusions" that "dry sow stalls and farrowing crates should be phased out eventually but only when key criteria can be met."</p>	
409		MS 12 (d)	234	<p>This topic has been thrashed about in the public arena for sometime, and as an Industry and myself as a pork producer of forty years, I find it sad that people who don't understand the sow, and her behavior, overnight become experts. I have been very disappointed at how the use of stalls has been wrongfully portrayed in the media for shock value by some animal rights activists. I can unfortunately understand how some people</p>	Noted

				<p>have been shocked, but like my wife who believed that the sow spent all her life in this crate, they are so wrong, and the message going out to our consumers is exactly that, and it is not true. Nor is there enough understanding of the welfare reasons for their use.</p> <p>I have Dry sow crates simply because it is a management tool for me to use in the first 30 days after mating, to help me protect the sow and the embryos after implantation has occurred. Sows at this particular time, after weaning, become extremely aggressive, and the damage they can inflict on another not so big sow is horrible, and they will. It also enables me to feed the sow at this crucial time the right amount of food, without competition. Sows are very vulnerable at this stage and need specialist care the dry sow crate gives us this just to provide her with the utmost care and attention she needs and deserves.</p> <p>I use to wean my sows each week into groups of 4-5, into concrete pens where they could interact with one another, this was contrary to what you should do, but I thought I would try, the results were horrendous, sow mortality and injuries more than doubled, smaller sows were being picked on relentlessly, and its not only the aggression but after 4-5 days after weaning they start to come on heat and start to jump onto one another. This can split the legs and thigh joints wide open if an older sow does it to a younger sow, and they will never recover from this.</p> <p>To me they are a very important management tool, that allows me to sensibly maintain the high standard of welfare for my sows that I need to, I am always looking for new options, but I still find it hard to argue not to have Dry crates for the first 4-5 weeks after weaning. The sows are safer and mortality is less, somebody please tell that this is not a welfare decision of mine to do this, I am fortunate that I have different styles of containment on our farm and it works, mainly because I have options. We cannot because of climate and soil type farm outside, if we did, it would indeed become an animal welfare problem. For example, a farmer down the road all of a sudden put 30 sows out in a paddock, fed them once a day.</p> <p>I need tools like dry sow crates, to make it easier and better for the animals well being, and future.</p>	
409		MS 12 (d)	251	<p>In regard to stall use we are in favour of the improved conditions as proposed and endorsed by the New Zealand Pork Industry Board.</p> <p>However, the increased standards and space requirements need time and</p>	Noted



				<p>investment to Institute the proposed changes. We continue to advocate the need for the use of dry sow stalls as these provide for animal safety, staff safety and reduced mortality rates.</p> <p>We accept that in the Industry there is an increased need to enlarge some facilities where insufficient space currently is not provided for sows to move about in appropriate housing conditions. In these regards, we are supportive of the proposed changes in the Code, given that there is an appropriate timeframe in which the improvements can be implemented.</p>	
409		MS 12 (d)	253	<p>We have used dry sow stalls since 1976 and since 2000 we have used group housing on sawdust (at some cost) for gestation after 4 to 5 weeks in stalls in line with the science used worldwide. The benefits of stalls for this crucial period are well documented and being able to match the sows diet to her requirements whilst her pregnancy is established, unbullied, is critical. The way some sows get knocked around in group housing adds a huge cost by either they become bruised, lame, abort etc or they need segregated for their own wellbeing which usually means they're given the safety of the stall! If the sow stall were to be banned I wouldn't be able to afford an alternative that gave the same degree of benefit to the sow. We also see a large amount of vulva biting which is distressing for all concerned.</p> <p>I'm also very concerned that New Zealand is not paying more careful attention to international best practice. For example, the EU, with its very high focus on animal welfare – and often with subsidies sitting alongside – is now phasing down the use of sow stalls to 4 weeks post-mating, by 2013. In addition, use of stalls around the mating period will be maintained. All indications emerging from the EU now is that it will not be able to meet this deadline, including Denmark and Holland. This is my current practice, as described above. The proposal in the draft code would reduce welfare of the sow, not improve it.</p>	Noted
409		MS 12 (d)	260	<p>My sows are currently in stalls for the first four weeks after mating. They are then group housed. Our sows are grouped in group sizes of 6, 7, and 8. Mated gilts are kept in a larger group of 30 – 50. The current system has developed gradually following a period where we had moved to fully group housing and then back to 4 weeks of stalls The attached document is a submission written in 2001 with regard to our position on stalls then and with the intervening 10years of research and science nothing tells me that group housed animals are better off than stalled, especially in that first 4</p>	Disagree

				<p>week period.</p> <p>For indoor farming, I believe the combination of the use of individual stalls for the first four weeks followed by group housing is the best compromise currently available for dry sows. Based on my own experience I cannot accept that sow welfare would be improved with full group housing- my experience graphically illustrates that it would be severely lessened.</p>	
409		MS 12 (d)	261	<p>We have enough early gestation stalls for four weeks and our sows are in those to gain weight and body condition and to prevent any fighting, or bullying and to enable a satisfactory number of embryos to form into foetus's to maintain a good number of healthy born alive piglets (11.6 is our current average). Before we had early gestation stalls we were total group housing and our born alive rate was only 9 (very low), this affected performance and profit substantially, this was due to bullying, competition at feed time and poor conditioned sows were bullied to the point of needing separation to maintain body condition or affected so badly with wounds, bruises, vulva biting causing irreparable damage and so rendering the sow infertile or sometimes even causing death. Sometimes the fighting can be so bad that hips or backs of sows could be damaged requiring them to be humanely destroyed, this is a huge cost not only to the profit to the unit but also a serious animal welfare issue.</p> <p>At this stage my sows were indoors in concrete pens. My objective was to build a welfare friendly facility on a sawdust base with plenty of space. This meant that while I was doubling the size of my pig farming operation, I wanted to build 2 sheds providing considerably more space than I had before. In this way I believed I was also allowing for further expansion if / when required. With my new buildings established, my approach was to wean into stalls for mating; mating was approx 5 days after weaning, and the day after mating I put my sows out into this sawdust based very spacious accommodation in pens of group size 10-12 sows. The result was the sows suffered injuries including bite marks, hip displacement and bitten vulvas. They were generally aggressive and territorial. The troughs were at the front of the pens and while there was plenty of trough space the more timid sows (maybe 3 of the group) hung back. The staff generally tried to throw some food to the back of the pen. The result was a loss situation with poor performance around 18 pigs per sow per year, which was similar to what I had achieved earlier, but of course now I had made a further major investment. I had no answers to improve performance. Most</p>	Noted

				<p>notably, my sows had always been in groups, so it can't be said that it was simply time to adjust. I sought expert advice, from specialists and other pig farmers. One suggestion was that stalls for the first 4 weeks after mating would help. So I invested in some stalls, at one end of the shed. It was a considerable investment close to \$50k. This lifted performance to 22 pigs per sow per year. Using stalls the sows can be fed individually. Also it had been very difficult to move sows in a group situation including identifying the empty sows. With stalls the empty sows can be identified earlier.</p> <p>Stockpersons find it difficult to move sows in groups.</p> <p>While I have the space if gestation stalls were banned, I believe my experience is a very telling illustration of the reduction in welfare and in productivity. Not only would my productivity go down as before but I would lose my investment in stalls; and my expansion options would be limited. If stall use can be maintained for 4 weeks, I could expand to 400 sows, as and if returns can be justified.</p>	
409		MS 12 (d)	262	The use of Sow stalls for the 1st 4 weeks post mating is a proven efficient system of improving the productivity of the sow and providing good protect to a highly sensitive animal and its future progeny.	Noted
409		MS 12 (d)	263	Although we do not have any sows in stalls we can also see the advantages of using them as it is easier to monitor the breeding stock and stalls also eliminates bullying. Pigs are very aggressive animals who exhibit social domination behaviour while they establish a pecking order. This occurs immediately after birth and continues throughout their lifetime. Obviously the bigger the animal the bigger the struggle to assert domination. Stalls alleviate this risk and as a management tool for the safety of staff and animals should not be abolished during the first 4-6 weeks after mating.	Disagree
409		MS 12 (d)	272	<p>PIC uses stalls on 4 of its 5 farms and strongly supports the ability to be able to use them for the first 4 weeks after mating. The reasons for supporting this are:</p> <p>Pigs are naturally hierarchical in a group situation and they will fight aggressively to establish their position in the pecking order. This causes additional stress on the subordinate animal. The use of dry sow stalls for pregnant sows protects the sow and her unborn piglets, particularly in the early stages of pregnancy.</p> <p>PIC maintains a number of different breeds of sow (5 pure lines, 4 cross bred lines) which have different temperaments and characteristics. When</p>	Disagree

				<p>these different breeds are mixed in a group housing situation the level of aggression and fighting is greater than with animals of the same breed type. It is very difficult and not practical for us to group house sows of only the same breed. In addition purebreds are less robust and less able to cope with the increased stresses of group housing.</p> <p>Sire line sows are very dominant feeders in a group situation. It is very important that all sows are in good body condition before mixing with those sire line sows when they are group housed. This is a unique issue that only breeding companies face.</p> <p>Dry sow stalls allow livestock people to feed and care for a sow individually so that the correct body condition is maintained. In group housing on our farms sow body condition varies because the bully sows dominate at feeding time. As a result they get more than their fair share of feed while other sows miss out.</p> <p>Illness or injury is easier to detect and treat in sow stalls.</p> <p>In support of the draft code pig producers have shown their willingness to change their farming systems and have moved significantly on the use of stalls. That is, down from 16 weeks to a maximum of the first four weeks. Furthermore the Pig Industry has brought forward the date from 1 Jan 2015 to 1 Jan 2013 when stalls will only allowed for 4 weeks after mating. If producers did not believe that stalls provided a welfare benefit to the sow then they would have been prepared to eliminate them completely. Pig producers are surely in a better position to know what is best for their pigs than lay-people who have no true understanding of the issue. NAWAC appears to have taken more notice of activists, vegans and public opinion in wanting stalls to be banned completely.</p> <p>The proposed code allows for the optional use of stalls for the first 4 weeks after mating. It does not say that you have to use stalls. As time goes on, new or alternative management systems may be developed to allow the individual confinement of sows to be removed. Right now this is the best system for the overall net welfare benefit of the sow.</p> <p>PIC is in the process of changing facilities to reduce the use of stalls down to the first 4 weeks only. This comes at considerable cost particularly where additional buildings will need to be constructed. If stalls were banned completely then this cost would increase by a further \$1m (estimated) to accommodate the extra space required.</p> <p>Constructing additional buildings will require obtaining Resource Consents</p>	
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				<p>under the Resource Management Act. Obtaining resource consents for piggeries often encounter objections from neighbours who feel that the intensity of our operation is being increased – which are not the case. This could mean a more difficult and expensive process to obtain the necessary Resource Consents and threaten pig producers’ “right to farm”.</p> <p>There will be ongoing productivity costs to PIC through lower reproductive efficiency in moving to more group housing. We know from our own performance figures that those farms with stalls have greater productivity than those farms using group housing.</p> <p>If having sows in stalls meant additional stress and poorer welfare then you would expect lower reproductive performance. This is not the case and we know from experience that happy sows are productive sows.</p> <p>We are strongly opposed to phasing them out completely by December 2017 for the reasons outlined above. Sow stalls provide the sow and her unborn piglets with a high standard of welfare and care for a limited period of time (4 weeks) and is consistent with the requirements of the Animal Welfare Act. Housing sows in groups after mating, does not provide a better standard of welfare in an indoor system. As such PIC requests that no date be set for when stalls must be phased out. NAWAC should encourage further research to be undertaken to demonstrate that sow stalls compromise the overall welfare of the sow greater than group housing.</p>	
409		MS 12 (d)	273	<p>In 1991 I converted my dry sow stalls and farrowing crates into weaner sheds and moved all of my sows outdoors. The extra space that was created by moving the sows outside enabled me to double the size of the piggery without investing too much extra capital. At that time I was not prepared to invest in new dry sow facilities, given the public opinion against the use of stalls for the entire gestation.</p>	Noted
409		MS 12 (d)	274	<p>Federated Farmers submits that we are supportive of farm management practices that ensure good animal welfare practices. It appears that the point of contention for the Pig Code is sow stalls. As an organisation we are not technical experts on this matter. However, based on our knowledge we are concerned that NAWAC are proposing sow stalls are prematurely banned.</p> <p>Currently there is no viable alternative to sow stalls and accordingly we submit that the phasing out should be reassessed. Pig farmers throughout the world make use of sow stalls as a key component of their management</p>	Disagree

				practices. The stalls are used within indoor piggeries to manage sows during pregnancy, to allow individual care and feeding while avoiding the downside of early pregnancy. We support the direction of change, but a date for change is not possible until there are viable alternatives available for all farming situations and our international competitors commit in cohesion with New Zealand.	
409		MS 12 (d)	275	<p>This week a leading article on the PigProgress.net website refers to Report 273 from Wageningen UR Livestock Research (March 2010), updating on EU-Welfare legislation on pigs. The report notes that group housing is being implemented but has not been tested, and this is an area identified for further research. (Please note that this refers to group housing aside from the first 4 weeks after mating and between weaning and mating). NZPork is actively researching the implementation of group housing specific to New Zealand systems (e.g. our Sustainable Farming Fund project), monitoring international developments in the form of technology transfer. We are positively moving towards limiting the use of confinement practices to the minimum required to provide for net welfare. For example, the industry has agreed to voluntarily shorten the transition time to phase down the use of stalls to 4 weeks, because this is recognised as international best practice. Additionally, alternative sow housing is a particular area of research focus for the Australian CRC over the next 5 years, and its internationally recognized scientists will be involved in this work.</p> <p>I would ask that NAWAC endorse this direction of change as providing for the welfare of our animals. Given that group housing is currently in its development stage, it is too early to regulate full group housing. I cannot accept that NAWAC would want to undermine the welfare of the New Zealand pig herd — by effectively requiring us to ‘practise’ group housing throughout the whole gestation period on the entire indoor industry.</p>	Disagree
409		MS 12 (d)	276	<p>Without sow stalls? Give us \$4.50 a kg for our product on a continuing basis and we'll build. At the current on farm net banked per kg of \$3.40, an absolute insult even to us most hardened types, forget it.</p> <p>After a few weeks inside, outside would come that nice clean mum and into the hot sun and an eager boar. Sunburn and a sore back from the attending boar would be the order of the day, and when it got really hot a little stress was all that triggered an abortion. So the sows had to come inside, so we built a crate shed where the sows could remain cool, where</p>	Noted

				<p>we could control the mating keep the big girls from eating their heads off and the smaller younger types fed up a bit. Back in '95 I could see the need to increase space for our pregnant animals, so heeding the call then for no stalls, I built Club Med where our ladies could roam in the sand then sleep in the shed in groups. Great idea you might say. And I think so too. The dozens that have been bullied to death by their bigger more aggressive mates, the dozens that have suffered vulva biting might disagree with you. If they were around to talk that is.</p> <p>So where have we got to then? Well I'll tell you. Our mums get mated then stay on in the crate shed with a stroll around every now and then, for four weeks. Critical to keep those foetuses alive and healthy. Then its out to club med for a romp around, hopefully not too much fighting with one's neighbour, then into the farrowing department when its time to prepare for babies. I think its a good system. It works for us, the pigs look good and are good. You are welcome to have a look.</p>	
409		MS 12 (d)	297	<p>In the last 2 years we have moved from a situation of having all of our sows in farrowing crates or sow stalls to 60% of the sows housed in groups. We have found the sows to be physically fitter but have found many disadvantages of group housing. These disadvantages include continual niggling (screaming, crashing, biting, bullying etc) none of which were an issue when our sows were stalled. Our stalled sows are quiet and content for the 23.5 hours per day when they are not being fed, whereas I cannot say that for the sows in group housing. Since moving to group housing there is a greater variation in body condition of our sows, that is we have some sows which are too fat and some sows that are too skinny because they are being bullied by the fat sows. This is surely not good welfare for the skinny sow. We are having to feed the sows more which not only increases our costs but results in some over-fat sows which are certainly less productive during lactation. We do employ as many management strategies as we are able to manage the sow to sow interactions in the groups but in the end there will always be some dis-content among the sows in any group scenario.</p> <p>The use of dry-sow stalls for a period after mating (4 to 6 weeks) allows us to manage some of the issues such as variation in body condition and helps minimise embryo mortality before implantation, and as such we would urge NAWAC not to totally ban the use of dry sow stalls.</p>	Disagree

				Furthermore strategic use of the dry sow-stall for a few weeks after mating actually gives a compromise of allowing the sows to become fitter by being able to exercise while still allowing some of the issues posed by group housing to be managed effectively.	
409		MS 12 (d)	298	I strongly disagree. The statement in Intro (l. 397) has been substantiated scientifically and concurs with my experience. In the 1970s as the Ministry of Agriculture and Fisheries' pig specialist I encountered several problems of poor reproductive performance in herds because sows were fighting in early gestation. This situation persists today in outdoor production systems. The health and welfare of sows, particularly of mated gilts, is improved when they are provided with individual accommodation in stalls during the first 3-4 weeks of gestation, i.e. until implantation has finished and sows become less aggressive. Increased susceptibility to deleterious effects of fighting before implantation has been completed, is a biological phenomenon. It is the normal biology of the sow. It will not change on 31 December 2012! It is illogical to include paragraph (d) in the Minimum Standards after the statement of fact in the Introduction. Such lack of logic challenges NAWAC's credibility.	Disagree
409		MS 12 (d)	299	Delete. A ban on sow gestation stalls cannot be justified on welfare grounds. In 2005 NAWAC accepted the limited use of sow gestation stalls was consistent with the requirements of the Act. The scientific evidence and evidence of good practice relating to the use of sow gestation stalls has not changed since 2005. NAWAC has no evidence on which to base its decision that the limited use of sow gestation stalls is now contrary to the requirements of the Act. NAWAC has elevated the importance of one of the five animal welfare freedoms over the others, but has not referred to any scientific evidence that supports this pre-eminence being given to the ability of sows to express the particular normal behaviours that are constrained by stalls for the simple reason that such evidence doesn't exist. Whereas the physical condition and health of sows can be ascertained scientifically, as can their freedom from injuries and stress, there is little agreement on how to evaluate or apply weightings to particular behaviours of pregnant sows. Therefore there is no scientific evidence that could support priority being given to the freedom for sows to have more range of movement and social interaction compared to compromises that may occur as a result in terms of their overall health and	Disagree



				<p>well-being. The Act requires any minimum standards designed to ensure sows can express normal patterns of behaviour, to be based on scientific evidence but no scientific evidence supports NAWAC's proposed ban. Yes – a ban will ensure all sows have more space and more ability to express social behaviour if they want to, but the ability to express those freedoms will come at a very high welfare cost in terms of the injuries, stress and denial of food and water that submissive sows will suffer. NZPork is cautious to apply its own values in determining which freedoms sows value the most, but industry veterinarians' view is that behaviour of sows on farm does not suggest that sows have an aversion to stalls. Certainly NAWAC has no evidence that its proposed ban is one that sows themselves would choose. There is no welfare evidence that a ban will improve the welfare of sows. NAWAC hopes that by proposing a ban farmers will voluntarily leave the industry before the ban comes into force, experienced stockpeople to manage sows in group housing will suddenly become available, and that technologies will be developed to allow pregnant sows to be group housed with the risks of fighting, injuries and stress and denial of adequate food and water to submissive sows mitigated and/or properly managed. Such aspirations are not consistent with the requirement of the Act that minimum standards be based on current and available evidence of good practice and scientific knowledge. NZPork recommends that NAWAC not proceed with the proposed ban on sow gestation stalls and instead identify group housing as an aspirational best practice and seek improvements to group housing so that when the technology becomes available it can properly ban stalls. (See substantial more detail on all these points in full submission)</p>	
409		MS 12 (d)	300	<p>I believe the code loses sight of the objective- which is to ensure the welfare of the animal, and surely measurement of animal welfare should be determined by scientific methods rather than by simply taking an emotive argument of allowing animals complete freedom of movement. We are talking about intensive farming here and not a play ground for fun. Scientifically an animal's welfare can be measured in many ways- such as productivity, (number of live piglets that survive and are healthy), absence of animal harm.</p> <p>If science shows that a sow stall is in the best interest of the sow's welfare then I am not sure what the issue is.</p>	Noted
409		MS 12	178	Industry veterinarians also point out that under conditions where good	Agree, MS added

				<p>management and stockmanship are suboptimal, stalls do provide for better welfare, and while such suboptimal stockmanship should not be a justification for supporting stalls, it is an unfortunate reality that the pool of good stockpersons available to the industry is limited.</p> <p>In an area not covered by the draft code, there is one situation in which stalls do provide for superior welfare - that is the relatively short period (<math>\pm</math> a week) after weaning when sows housed indoors are on heat. If confined in groups, the sows will mount and ride each, other on concrete or slats in a confined space, at this time. The distress and physical damage sows experience over this time is visibly and audibly obvious and this "week" can account for as much as 50% of sow wastage.</p>	
420		NAWAC comment	298	<p>I disagree with incorporating into the Code the commitment to cease use of dry sow stalls altogether by December 2017. Inclusion of the date December 2017 means that "key criteria can be met" and "alternative technology and management systems which deliver better welfare outcomes overall at a practical and economic cost which allows New Zealand producers to remain competitive with producers of imported product" will occur before December 2017. There is no guarantee that this will happen. One cannot schedule results of scientific experimentation.</p>	Disagree
420		NAWAC comment	299	Delete	Agree, this was only ever for the consultation
423		Note: s 73	138	<p>The "exceptional circumstances" exemption is a stringent test that is not met on the information available. The 'exemption' contained in ss 73(3) &amp; (4) appears to have been too liberally invoked by the Committee in recommending the issue of other codes of welfare containing non-complying provisions, and including the current Code for pigs. It seems timely, in the context of this present review, to set out the legal principles governing the proper application of these statutory provisions: 6 principles detailed in submission. On the information publicly available, including the draft MAF economic analysis, there do not appear to be sufficient grounds even to begin to make a case under s 73(3) for "exceptional circumstances" such as would justify the continuing serious contravention of ss 10 and 29(a) &amp; (h) (including the protracted time frames for restricting and then banning these practices) that Minimum Standard No 12 would permit; nor is there sufficient material for the Committee to be properly informed. The draft MAF economic analysis on which the Committee relies</p>	Agree, but these considerations have been undertaken

				(see Draft Code p 22) lacks any independent review, is based on inadequate data, and is too narrow in its scope properly to address all the relevant issues under ss 73(3) & (4). Each of the options of an immediate 4 week restriction, an immediate ban, or a significantly more accelerated timetable for the banning of dry sow stalls, needs to be given proper consideration. It is submitted that the Committee should undertake a careful and detailed consideration of the “exceptional circumstances” issue, having regard to the legal principles set out above, including obtaining any appropriate independent reports and advice. The Committee is required (see s 73(2) of the Act) to gather whatever material may be needed for it to be sufficiently informed to fulfil its statutory responsibilities.	
423		Note: s 73	173	<p>The second reason for NAWAC allowing sow stalls in spite of their acknowledgement that they do not meet the requirements of the AWA is economic. NAWAC has allowed sow stalls to continue, citing the “exceptional circumstances” provision in Section 73(c) of the AWA, which states that NAWAC can recommend minimum standards that do not comply with the Act if they have regard to “the economic effects of any transition from current practices”. SAFE considers that this section of the Act does not justify a continuation of sow stalls.</p> <p>Section 73 (c) of the AWA could theoretically excuse producers from any obligations to their animals, since it can always be argued that any improvements in animal welfare will result in increasing costs to producers. If the most economically efficient way to raise animals was also the most welfare friendly, there would be no need for animal welfare regulation at all; simple self-interest would ensure animals were kept in suitable conditions. To prevent farmers being allowed to do whatever they like to their animals, and making the AWA in effect a toothless piece of legislation, the select committee considering the Act made it clear that the section allowed noncompliance with Section 10 of the Act only under “exceptional circumstances”. It could not be used as a general “opt-out clause”. The effect of economics can also only be used when considering phase-out times. It should not be used to prevent welfare improvements from taking place. The select committee picked out intensive farming of pigs and layer hens for special mention, as practices that needed to change. A similar argument was made by the Animal Rights Legal Advocacy Network, (ARLAN), who successfully challenged the Code of Welfare for Layer Hens to the Regulations Review Committee on the basis</p>	Disagree

				that NAWAC were expanding the notion of “exceptional circumstances” well beyond the intent of the Act.	
423		Note: s 73	193	The purpose of the Animal Welfare Act 1999 was to prevent cruelty to animals including commercially farmed animals. By allowing cruel practices in farming/managing pigs to continue, NAWAC is not upholding the principles of this act. It is good that NAWAC has recognised that sow stalls and farrowing crates do not meet the obligations of section 73(1) of the Animal Welfare Act 1999. But it is bad that it allows these to still be used, through its wrongful and twisted interpretation of section 73(3) of the Act. NAWAC is using section 73(3) of the Animal Welfare Act 1999 as the excuse for the current code and draft code not meeting the physical, health and behavioural needs of pigs. It claims that overseas pork producers will be more price competitive if New Zealand adopts an animal welfare code for pigs that meets their physical, health and behavioural needs as the exceptional circumstances for us not doing so.	Disagree
423		Note: s 73	299	Delete and replace with: NAWAC considers that the use of dry sow stalls for extended periods does not fully meet the obligations of the Act. Minimum Standard 12 (c) reduces the transition period for the phasing out of dry sow stall use beyond 4 weeks after mating during any one pregnancy to 31 December 2012.	Disagree
435		Indicators	146	A minimum measurable size is necessary because the level of sow comfort cannot be accurately quantified.	Disagree
435		Indicators	178	<i>BP 1</i> : presumably this relates to MS 12(e). If so, we suggest that "... e.g. stereotypic behaviours displayed." is added to the MS as stereotypic behaviour is not mentioned in this section prior to it being mentioned in the indicators. <i>BP 4</i> : How is this an EI of MS 12? Why has this behaviour been selected? The ability to carry out investigatory behaviour in a stall is very limited. Mouthing of the bars may be classified as investigatory behaviour by some but stereotypic behaviour by others. Suggest this is deleted.	Disagree  Agree, changes made
441		GI	62	What is it about presence of boar that can dampen aggression in females? Is actual presence needed or just the smell or sound of a boar and could these not be provided artificially to produce the same effect on sows.	Disagree
	5.3 Boars				
450		MS 13	164	We urge the welfare code to at least apply the conditions on space,	Noted

				stimulus, variety, exercise and compatibility conditions for boars, in a way that minimizes discretion for pig owners and farm operators and secures the best care for pigs possible.	
450		MS 13 (a)	62	Requires that boars can turn around. Why should the very same space requirement not be a minimum standard for sows at all stages of their lives? Does NAWAC have a gender bias or is this again putting economic interests ahead of animal welfare ones?	Noted
450		MS 13 (a)	109	Should be amended to read: (a) Boars must be provided with sufficient space in order to move around freely and perform a range of natural behaviours whilst maintaining separate dunging, lying and eating areas. This MS implies that a boar can be heavily restricted in terms of space as long as it is still able to turn around, stand up and lie down. In order to allow for the boar to perform a range of natural behaviours and to perform a reasonable amount of movement and exercise.	Disagree
450		MS 13 (a)	138	Whilst an improvement on the use of stalls, the minimum space requirement for boars (to be able to stand up, turn around and live comfortably in a natural position) is still inadequate and does not comply with ss 10 & 29(a).	Disagree
450		MS 13 (a)	159	How can these limited activities possibly be construed as "range of normal behaviours? What about walking around? Etc etc etc Substitute a) with The space needs to be large enough for boars to conduct normal behaviour.	Disagree
450		MS 13 (a)	173	(a) is to be rewritten to read: All Minimum Standards 1-9 as amended by SAFE shall apply to boars.	Disagree
450		MS 13 (a)	196	We reiterate our position that no pig should be confined to a factory farm or barn. The minimum standard for Boars must include that boars are given enough space to ensure their physical needs are met and that they are able to express normal behavioural patterns, such as rooting or foraging.	Disagree
450		MS 13 (a)	299	NZPork fully supports the principles of this minimum standard. However, in our view (a) would be more appropriately expressed as: Boars must be provided with sufficient space that they can stand up, turn around and lie comfortably in a natural position, and <i>that provides for</i> separation of dunging, lying and eating areas. This is because boars' natural behaviour is unlikely to maintain separation of dunging, lying and eating areas. Pheromone production is an important	Agree, change made

				facet of courtship behaviour and boars may choose to roll in their dunging area. Boars are generally housed individually. They are not normally kept in male groups because they fight, and grow very large if kept with sows because they can command a disproportionate share of food. Given the relatively low stocking density, pens must be small enough to enable boars to maintain appropriate body temperature, and this is a particular issue with the housing of young boars. A common practice is for them to be utilised twice a week for mating / heat detection, and so pens require easy access.	
451		Indicators	178	Suggest adding "...with separate dunging and eating areas".	Agree, change made
453		GI	178	If boars need "adequate exercise to ensure their physical needs are met", why don't sows?	Noted
453-459		GI	178	Apart from the second paragraph, these should all be RBPs. "Need to" implies "should".	Agree, changes made and RBP's included in other relevant sections
458		GI	159	Boars should be kept in housing and under conditions where lameness does not occur. Lameness should be able to be used as a tool by MAF inspectors that pig welfare has not been met.	Agree, change made
460	6. Handling and Husbandry procedures		108	Everything set out in the new draft code is correct. Slow and careful. Don't hurry them. Pellets for bribery.	Noted
464	6.1 Handling	Intro.	178	Suggest some explanation of use of electric fencing in the Introduction.	Disagree
465		MS 14	164	We urge mandatory requirements for handling and husbandry so there is no ill treatment, good handling, minimal stress and appropriate design and development of paddocks and raceways.	Disagree
465		MS 14 (a)	62	No animal should be picked up or suspended by any leg, front or rear, as this is likely to induce fear in the animal. One of the basic well-beings that the Act seeks to ensure is a freedom from distress and lifting a pig by a single leg is likely to contravene this.	Disagree Noted
465		MS 14 (a)	109	Should be amended to read: (a) Pigs, including piglets, must not be picked up or suspended by one front leg, ears or the tail.	Agree, change made
465		MS 14 (a)	159	So is picking up by one back leg or by 2 ears OK? There must be a far better way to describe how pigs are to be picked up than what NAWAC	Agree, change made

				has written here. It leaves the animal open to abuse that cannot be prevented by MAF or any other inspection body.	
465		MS 14	109	A further section should be added, which reads: (d) Pigs must be handled at all times in such a way as to minimise the risk of pain, injury or distress to the animals.	Agree, change made
465		MS 14	173	No change	Noted
468		RBP (a)	109	Should be a minimum standard.	Disagree
471		GI	109	WSPA disagrees with the suggestion that nose snares are a 'useful' method of restraining pigs. The use of a nose snare causes discomfort and sometimes pain to the pig. It is very difficult to train a pig to accept a nose snare and as a result the pig is often distressed by its use. If a nose snare has to be used then it should only be when it is absolutely necessary. The snare should be kept clean and hygienic, used by a competent and trained person and not used for more than a few minutes. The nose snare should not be used to move the pig at any time or to tie the pig up. The snare should be maintained in good condition to avoid injury; a frayed cable for example, can cut into a pig's nose.	Agree, wording changed  Disagree
	6.2 Moving Pigs				
479		MS 15 (a)	164	We urge no use of force (rather than minimal as discussed in the code), when moving pigs.	Disagree
479		MS 15 (b)	159	So whipping is OK on "nonsensitive " areas? It should read whipping is not OK at any time.	Disagree, but wording changed
479		MS 15 (b)	164	We urge no prodding or whipping of pigs at all, not just in their "sensitive areas". We support a ban on use of weapons of any sort. As noted in the discussion, pigs are highly intelligent and sensitive animals and do not require aggressive or physical control, but should be respected and encouraged by acknowledging their intelligence and attentiveness.	Disagree, but wording changed
479		MS15 (c)	84	I commend NAWAC for recommending no electric prods be used.	Noted
479		MS15 (c)	173	No change. SAFE commends NAWAC for stipulating that electric prodders must not be used.	Noted
479		MS15 (c)	211	Electric prodders should only be permitted when pigs are being loaded. Particularly where large pigs are being loaded on trucks it is common for pigs to weigh more than staff. There are limited options available to staff to prompt stubborn pigs to move that don't inflict wounds or bruises on pigs. The flip side for staff is that they need techniques that protect their health and safety. The benefit of an electric prodder is that with a minimal amount of stimulation a pig will move in the desired direction with no permanent	Disagree

				physical damage to the pig and with no danger to staff. In the wrong hands a prodder is totally inappropriate but in the right hands it is an excellent solution to a frustrating problem. Therefore we request that electric prodders are only permissible during loading and only when there is a risk of physical injury to staff or other pigs by the prodder not being used.	
479		MS 15	109	The following sections should be added: (d) Pigs must be handled at all times in such a way as to minimise the risk of pain, injury or distress to the animals. (e) Floors should be non-slip to avoid injuries. (f) Noise levels should be kept to a minimum to avoid distressing the pigs.	Disagree
480		Indicators	178	Title should be MS 15, not 16. <i>BP 2</i> : Suggest "No injuries such as welts and bruises are apparent".	Disagree, but changes made
486		GI	109	This section should be amended to read: Calm pigs are far easier to move than excited pigs. Therefore, a good understanding of pig behaviour can be particularly beneficial in ensuring the welfare of the pigs and the efficiency of the procedure. For example, pigs are very sensitive to distractions such as moving objects, noises and shadows, the removal of such distractions can help to ensure that the pig does not balk or turn around, which would impede the procedure and distress the pig. Pigs also have a tendency to move from a dark area to a brighter area, which makes the use of strategic lighting an effective tool when moving excitable pigs. An understanding of a pig's flight zone can also make the movement of pigs from a large space both calm and easy to carry out. The previous experience of the pigs is also important. In particular, piglets that have never walked on concrete may be difficult to move. However, if they are given a chance to explore the new floor surface prior to being driven over it they will be calmer and easier to move.	Disagree
	6.3 Weaning				
494		MS 16	109	The following section should be added as a minimum standard: (b) Piglets should not be weaned at less than 28 days, with the exception of orphaned, sick and surplus piglets.	Disagree, though added as RBP
494		MS 16	173	Add: (b) Age at weaning must not be less than 33 days.	Disagree, though see RBP c)
494		MS 16	260	In the past I have experimented with reducing the average weaning age down to 21 days but found that growth rates are compromised, more animals are treated for sickness and mortalities increase. Ideally and if we had more accommodation the weaning age would be closer to 28 days	Noted



				and this point was emphasized by my manager this morning. It is critical to the development of the growing pig that the effects of weaning are minimized as much as possible. To achieve this at 10 days of age litters are allowed to mix together to allow social interaction of piglets and reduce the mixing and fighting at weaning. Creep food and water bowls are introduced as well to get the piglets digestive system prepared to go without sows milk at weaning. However weaning age is the biggest factor in determining piglets ability to overcome the weaning process and it is important that the time with their mother is as long as possible. I believe that the current proposal (MS 11 (d)) would lessen the welfare of piglets.	
495		Indicators	159	<i>BP 3</i> : 18 days is too soon to wean. The spread of time given here is too large. ie 33 days is almost twice as long as the quoted minimum time of 18 days. Surely a tighter range for weaning period can be expressed? Also earlier in the document it states that piglets should be weaned by 6 wks of age ie 42 days.	Agree, wording changed
495		Indicators	164	We support the requirement to nurture runts and babies and to support social interactions and bonds including the support of litter mates and stable groups.	Noted
495		Indicators	173	<i>BP 3</i> : should be MS	Disagree
495		Indicators	178	Title should be MS 16, not 17.	Agree, change made
495		Indicators	196	<i>BP 3</i> : We do not believe that 6 weeks should be set as the maximum for sows and piglets kept in a free-range or small farm situation. It is accepted practice in New Zealand that pigs will generally be weaned at 6 – 8 weeks. Our own experience is that most sows will naturally wean their pigs between 6 – 9 weeks. Forcibly removing piglets from a sow can be extremely mentally distressing for a very maternal sow We also believe that 18 days is far too early to remove piglets from their mothers and that this should be raised to 28 days.	Agree, wording changed
	6.4 Elective Husbandry Procedures				
511		Intro.	178	This RBP (b) would benefit from some explanation in the Introduction.	Disagree
512		MS 17 (a)	159	Add “with anaesthetic”.	Disagree
512		MS 17 (a)	173	Tail docking is equally unacceptable in that it causes both short-term and long-term pain. The stumps of the tail can form bundles of peripheral nerve fibres (neuromata), indicative of chronic post-amputation pain. Pigs may	Disagree

				therefore be suffering from long-term pain in their stump throughout their life. Tail docking has been justified on the basis that it prevents pigs from biting each others' tails. However, tail biting, like other forms of aggression, can be reduced by improvements in management including provision of straw, satisfying food and more spacious housing (see above). It is our contention that aggression should be prevented in this way, or in extreme cases by individual housing, and not by tail docking. References cited in submission.	
512		MS 17 (a)	196	We completely oppose tail docking for pigs. This is a practice commonly performed in intensive farming situations and provides absolutely no health benefit for a pig. A tail is a completely natural appendage on a pig. It is an excellent indicator of mood in a pig and pigs enjoy having tails. Tail biting is a behaviour that develops in unhappy, agitated pigs in confined spaces. It is a clear indication of mental unwellness in pigs. Removing tails does not promote mental wellbeing in pigs.	Disagree
512		MS 17 (a) & (b)	62	There is a contradiction between MS (a) and (b), the former says docking, if performed, MUST occur before 7 days of age while the latter implies that it can be done after this age as long as it is by a veterinarian. Which one does NAWAC mean?	Agree, wording changed
512		MS 17 (a) & (b)	109	Sections (a) and (b) are confusing. (a) states that tail docking must be performed before 7 days of age if it is to be done, however standard (b) seems to allow for the procedure to occur beyond 7 days providing it is performed by a veterinarian. If it is imperative for tail docking to occur before 7 days of age then there would be no call for a veterinarian to perform the procedure after those 7 days. The Welfare of Livestock Regulations 1994 (UK) state: "Neither tail-docking nor tooth-clipping shall be carried out routinely but only when there is evidence, on the farm, that injuries to sows' teats or to other piglets have occurred or are likely to occur as a result of not carrying out these procedures." Alternative solutions such as improving environmental conditions and decreasing stocking density should be sought before resorting to tooth-clipping and tail-docking. Castration should be avoided and alternative solutions should be sought, for example pigs could be slaughtered before reaching sexual maturity to avoid the possibility of "boar taint".	Agree, wording changed
512		MS 17 (b)	159	"Delete "over 7 days of age". All castrations must be carried out by a veterinarian with anaesthetic.	Disagree

512		MS 17 (b)	164	We support a prohibition against tail docking, and support veterinary care for any surgical procedure required. We are aware of historic castration and tail docking procedures and reiterate that these should be prohibited.	Disagree
512		MS 17 (b)	173	Most mutilations approved by the draft Code of Welfare are excessively painful, or are necessary only for economic reasons. Castration, for example, is used only to prevent “boar taint”. This is purely an economic consideration as it affects the taste of the flesh. In addition the same effect can be achieved through immunocastration. The Scientific Veterinary Committee has highlighted the pain involved with castration. The cutting of the spermatic cords is the most painful part of castration. While there appears to be a prevailing “urban myth” that younger animals do not feel pain, and therefore that it is acceptable to castrate younger piglets, the experimental evidence strongly suggests that younger piglets feel the pain of castration as acutely as older ones. SAFE therefore considers there is no justification for surgical castration. References cited in submission.	Disagree
512		MS 17 (c)	159	Add “with anaesthetic”. My premise is that an anaesthetic should always be given, as should pain relief; for any procedure where a human receives an anaesthetic and pain relief	Disagree
512		MS 17 (c)	173	The Scientific Veterinary Committee considers that the results of investigations into the value of tooth clipping are inconclusive. As a precautionary measure, SAFE considers that tooth clipping should not be routinely carried out, but should be a restricted surgical operation conducted under veterinary supervision and using adequate anaesthesia and analgesia. References cited in submission.	Disagree
512		MS 17 (c)	204	Why is teeth clipping of piglets up to 5 days old is now allowed, whereas previously it was 3 days?	Disagree
512		MS 17	173	The Standard shall be rewritten as follows: (a) Tail docking must only be performed under veterinary supervision, with provision of adequate anaesthesia and analgesia, and only if necessary for the good of the pig. (b) Tail docking shall not be used as a means of preventing tail biting. Aggression should instead be controlled by means of good husbandry techniques as stipulated in the Minimum Standards and recommended best practices. (c) Clipping and grinding of teeth must not be carried out.	Disagree

				<p>(c) Tusk trimming must be performed only under veterinary supervision, with provision of adequate anaesthesia and analgesia if required, and only if necessary for the good of the pig.</p> <p>(d) Ear notching must not be carried out. Ear tagging must be carried out in such a way that minimal tissue damage occurs.</p> <p>(e) Nose ringing must not be carried out.</p> <p>(f) Surgical castration must not be carried out.</p>	
512		MS 17	193	<p>Elective husbandry procedures such as castration, tail docking and teeth clipping are all painful procedures used to try and minimise injuries between fighting pigs. In the draft code surgical castration or tail docking only require that a vet carry out the procedure when the pigs are over 7 days old. I disagree with this because pigs of all ages can and do feel pain.</p> <p>The reason pigs fight so much is because of frustration at the cramped conditions. Tail docking and teeth clipping do not reduce the urges of the pigs to bite each other out of aggression and boredom; they just take away means to do so and the easy target (the tail).</p> <p>Painful elective husbandry procedures should be banned, but if this does not happen should at least require strong pain relief.</p>	Disagree
513		Indicators	178	<p>Title should be MS 17, not 18.</p> <p>These do not specifically relate to the MS.</p> <p><i>BP 3:</i> is meaningless unless “invasive procedures” are defined as significant surgical procedures under the Animal Welfare Act 1999. It is clear from MS 17 that non-veterinarians can undertake tail docking and surgical castration, both of which are invasive.</p>	<p>Agree, change made</p> <p>Agree, wording changed</p>
515		RBP (a)	62, 109, 123, 173	Should be a minimum standard	Disagree
516		RBP (b)	62, 123, 173	Should be a minimum standard i.e. surgical castration MUST not be carried out, by a veterinarian or any other person.	Disagree
		RBP (c)	123	Should be a minimum standard. This will reduce pain and unnecessary suffering.	Disagree
520		RBP (d)	109	Should be amended. Ear notching is a painful mutilation and there are now more humane alternatives such as the use of electronic ear buttons. Therefore the use of ear notching as a method of identification should be discouraged.	Disagree
521		RBP (e)	123	Should be a minimum standard. This will reduce pain and unnecessary	Agree, MS has been

				suffering.	included
522		RBP (e) & (f)	109	Should also be amended. Nose rings, clips and wires are not only painful procedures but they prevent pigs from performing normal exploratory behaviour by causing discomfort when digging and rooting. Therefore, the use of nose rings, clips and wires should not be endorsed.	Disagree, but see MS d)
523		RBP (f)	123	Should be a minimum standard. This will reduce pain and unnecessary suffering.	Disagree
530& 535		GI	109	The sentences relating to ear notching and nose rings should be amended as they are painful procedures and should be discouraged.	Disagree
	6.5 Pre-transport selection				
544		Intro.	178	This RBP (c) would benefit from some explanation in the Introduction.	Disagree
545		MS 18	109	This section should be amended to include: (b) All pigs must be able to stand and bear weight on all four limbs and be fit enough to withstand the journey without suffering unreasonable or unnecessary pain or distress. (c) No sow should be transported during the last two weeks of pregnancy.	Agree, change made  Disagree, but see MS c)
545		MS 18	159	There should be some measurable criteria to define the words “are fit”	Disagree, they are defined by veterinary policies
545		MS 18	164	We support the code conditions requiring that pigs are fit for transport and that this is only done in a way that is humane and that minimizes stress to the pigs.	Noted
545		MS 18	173	Add: (b) All pigs selected for transport must be healthy and able to support weight on all four limbs. (c) Stocking densities on transport vehicles shall be in accordance with the Minimum Standards for animals transported within New Zealand. (d) Pigs should receive no more than two tattoos before being transported to slaughter.	Agree, change made  Disagree  Disagree
550		RBP (b)	109, 123	Should be a minimum standard. Pigs are more sensitive to heat stress compared to some other farm animals due to their physiology.	Disagree
551		RBP (c)	159	Need to describe how are tattoos administered and when (probably under Standard No 17 —elective husbandry procedures.	Disagree
551		RBP (c)	173	Should be MS	Disagree

558		GI	159	Access to water prior to transportation needs to be included.	Agree, change made
	7 Disease and Injury Control				
559			108	Everything listed here is correct	Noted
565		MS 19 (a)	159	Daily is not enough when animals are housed in high density housing as occurs in indoor piggeries. This needs to be at least twice daily.	Disagree
565		MS 19 (a)	164	We think that checking animals for health and injury once a day is probably not enough.	Disagree
565		MS 19 (e)	164	Support the attention to clean conditions so that pigs are adequately cared for, with attention to hygiene, fresh clean bedding and good health.	Noted
565		MS 19	173	Add: (e) No hormonal growth promotants shall be used. (f) Antibiotics shall not be used prophylactically. Antibiotics must be used only with a veterinary prescription, and only in response to a specific infection. In addition, all recommended best practices shall be incorporated into the Minimum Standard.	Disagree
566		Indicators	159	BP 1: Need twice daily inspection. BP 3: Cause of death, illness or injury is determined BY A VETERINARIAN... Generally in this section there are too many undefined words e.g "BP 8 Define a low level etc	Disagree Disagree
568		RBP (a)	173	Should be a minimum standard	Disagree
571		RBP (b)	173	Should be a minimum standard	Disagree
573		RBP (c)	62, 173	Should be a minimum standard given the tendency of pigs to aggravate each others' injuries	Disagree
575		RBP (d)	173	Should be a minimum standard	Disagree, but see MS d)
576		RBP (e)	62, 173	Should be a minimum standard given the biosecurity advantages of keeping good records.	Disagree
578		RBP (f)	123, 173	Should be included in the minimum standards to further clarify minimum standard (b).	Disagree
583		RBP (g)	173	Should be a minimum standard	Disagree
	8. Emergency humane destruction				

593			108	This humane destruction clause is very important. If you don't know how to do it. Get someone who does. Or use a shot gun at close range.	Disagree
601		MS 20	173	Add: (e) Humane destruction must be a last resort, to be considered only if veterinary attention is not available or has been found to be inadequate. In such cases humane destruction must be in the best interest of the pig.	Disagree
602		Indicators	159	• BP 2: Add "... and that training is documented"	Disagree
602		Indicators	178	<i>BP 5:</i> The wording of this is confusing – possible suggestion –“Stunning results in immediate insensibility and, with some methods, death. If death does not result from stunning, it is ensured by bleeding out”.	Disagree
604-611		GI	178	The first two paragraphs should be RBPs	Disagree, though wording changed
	9. Welfare Assurance System				
593			87	There is currently no formal system for compliance monitoring other than whistle-blowing or trespassing. This seems to be a serious flaw in the integrity of the whole process of these Codes and animal welfare legislation in general. Whilst the NZ Pork Industry Board states that the issues that are sometimes raised relate to a very small proportion of farmers only, no-one actually knows whether this is true at all. There should be a register of all pig farms, with details of the number of pigs and the practices they use. There should be a regular, 6-monthly inspection of all pig farms, the animal management practices and the condition of the animals. Six-weekly visits of all farms with dogs, throughout New Zealand, were undertaken in the days of the hydatids and sheep measles legislation. This used to include an annual visit with the farmer to discuss home-killing practices and offal treatment methods. The reasons for this weren't to do with animal welfare, of course, but the deep and financially significant concerns there were when poor farming practices jeopardised meat exports. If it could be done then, it can be done now. There is no point establishing Codes and laws if there is no method of ensuring compliance. Recommendation: that a formal system for monitoring compliance with the <i>Animal Welfare (Pigs) Code of Welfare 2009</i> (and indeed all codes of welfare) be established and implemented as soon as possible.	Noted
593			108	You also need more regular piggery inspections.	Noted

633		Intro.	251	We note the proposals for future on-farm audits, which has the support of the New Zealand Pork Industry Board.	Noted
633		Intro.	275	I also wish to clearly differentiate the campaigns of animal rights activists from public / consumer opinion. Obviously the New Zealand pork industry wants to provide what its consumers want — otherwise we would go out of business. Our research indicates that our mainstream consumers do care for animal welfare, alongside a range of other considerations including country of origin, and providing food for their families at a reasonable price. Furthermore, New Zealand consumers indicate they generally trust farmers to 'know what they're doing', and want an overall assurance of this. Under my chairmanship, NZPork is now implementing an audit system across all commercial farms, in conjunction with wholesalers, who also have the ability to set supply conditions. I believe we are a leading New Zealand livestock industry in this regard. We are also actively providing consumers with fair and balanced material on our farming systems including explanation for the use of various practices. (Refer <a href="http://www.pigfaminginnz.co.nz">www.pigfaminginnz.co.nz</a> ) This has generated very favourable feedback right across the supply chain. The irony is that a good proportion of New Zealand pork arises from 'free farming' systems — like my own farm. Yet a very small amount (estimated to be less than 5%) is sold on this basis. If consumers desired it, it could be provided.	Noted
641		RBP (c)	159	NAWAC needs to define "significant sickness" The code needs to provide CLEAR guidelines as to what incidents have an implication on current industry practices. The reports should be sent to an independent body such as MAF.	Disagree
651		GI	159	It is excellent and correct that these groups play a role in disseminating information to members, but they should NOT have a role in defining welfare standards. These are industry groups and therefore have an interest in putting economics before pig welfare. Management practices for welfare standards must be defined and assessed by an independent body such as MAF or the SPCA.	Noted
	<b>Appendices</b>				
660	Condition Scoring of Pigs	Appendix I			
666	Interpretation and Definitions	Appendix II	178	The following terms in the Definitions do not appear in the code: Creep meal; Farrowing pen; P2; Pathogen; Proprietary liquid supplement; Wet feeding	Agree, those not in the final code deleted



666		Appendix II	298	In mammals mothers suckle and babies suck. <i>Creep meal</i> definition has piglets suckling.	Agree, definition deleted
668	Legislative Requirements	Appendix III	159	I am very disappointed that NAWAC has been allowing themselves override sections 730) & 73(3) of the Act by claiming “exceptional circumstances”. There should be no circumstances where animals suffer physical or psychological stress because humans want to turn a buck! This is not a satisfactory reason and NAWAC should signal this by standing up for the animals affected by the code of welfare it is responsible for.	Noted

### Response to specific questions

Question	Submission Number	Submission	NAWAC response
Qn1		1. <i>Do you consider a code of welfare for pigs to be necessary? Are there any alternatives which would achieve the same outcome as having a code of welfare?</i>	
	32	Yes, a code of welfare for pigs is necessary, just as it may be for all animals as people can be ignorant about the needs of living creatures.	
	39	It is with great concern for animal welfare and in this particular case, pigs, that we are making this submission. If all people in charge of animals adhered to the Animal Welfare Act we would not need to do this but unfortunately as there is a lack of enforcement of the code and especially the ethics of those ‘in charge’ having a Code and being able to update it and make submissions to it is indeed necessary.	
	65	Yes I believe that codes are important and that it is appropriate that NAWAC is the body to publish them. However the codes, at best, are guidelines for animal welfare and, as the SPCA and MAF Enforcement have already indicated, they will not be used as primary evidence in a court case. There is a need for industry-based guidelines. Because the PIB has no power to force their members to conform to any particular action or behaviour, and their function is essentially market-driven, there is a need for some industry-independent body to provide them. NAWAC and the codes that it produces is therefore fundamental to animal farming in New Zealand. The only conceivable alternative would be for a body such as Federated Farmers to be responsible for providing the guidelines.	
	67	We believe that all animals deserve to be respected. Where animals are farmed, they should be farmed in conditions as close as possible to their natural environment. Sadly, many farmers and members of the public have little consideration for the welfare of animals. This lack of consideration makes the necessity of Codes of Welfare an absolute imperative. Binding documents like the various Codes of Welfare set out minimum standards for the welfare of the animals they serve. These documents assist those responsible for the welfare of animals in setting standards of practice. Sound,	

		responsible practices surely help establish New Zealand as a leading example in the humane treatment of farmed animals.	
	71	I believe the code of welfare for pigs is necessary as there are farmers who are and will keep exploiting and mistreating pigs. The code should be stricter on ensuring pig owners maximise animal welfare and the code should carry more legal weight and enforceable harsher penalties.	
	80	I support this code to the extent that it outlines the expectations and standards for the care of pigs clearly and explicitly. I believe that a code of welfare for pigs is necessary because New Zealand should match or exceed the standards of other first world countries, such as those in the European Union for example.	
	88	We certainly need a code of welfare for pigs, and in the main I agree with the practices set out in the draft. It would be unnecessary if pigs were protected by the same legislation that protects pets. Then the animals would be raised properly, and killed humanely.	
	91	A code of welfare is necessary to ensure that minimum humane standards are met by pig farmers. An absolute ban on the cruelest confinement systems - sow stalls and farrowing crates - is crucial. In the past two years, six U.S. states (California, Colorado, Florida, Oregon, Arizona and Michigan) have banned sow stalls (also known as 'gestation crates') and two more states (New York and Ohio) are proposing to do so this year. The entire European Union banned sow stalls back in 2003, to take effect in 2013, and they are already banned in the UK and Sweden. Smithfield Foods, the largest pork producer in the US, have also agreed to phase out sow stalls. A ban on sow stalls in New Zealand is therefore crucial if are to meet international animal welfare standards.	
	94	Yes, I do consider a code of welfare for pigs to be necessary. I also believe that when in place, it should be strictly policed. Regular checks should be carried out to ensure the code is being adhered to, as from what we have seen on television, some farmers have no regard for the welfare of their animals.	
	101	I support the concept of codes of welfare, including a code for pigs.	
	108	Code of welfare is definitely necessary.	
	123	A code of welfare is essential. It provides a guideline to standards and practices for farming enterprises or individuals based on scientific knowledge. Animal welfare standards are made uniform and it is possible to measure and compare them nationwide. Individuals in charge of pigs are made aware of their obligations under the Animal Welfare Act 1999.	
	133	A code of welfare for pigs is necessary and the conversion to a new style of code in which minimum standards are now statements of welfare outcomes to be met rather than prescriptions should assist MAF inspectors and give a clearer message to farmers.	
	134	It is my belief NAWAC's recommended changes to the Pig Code of Welfare does not meet the requirements of the NZ Animal Welfare Act 1999. Anew revised code is absolutely necessary to uphold a standard of welfare appropriate for pigs as a species as their requirements differ greatly from other animals used in meat production.	

	135	Firstly, I would like to comment that a Code of Welfare for Pigs is absolutely necessary. Pig owners need to know what is expected of them, and the code provides a good basis for legal action.	
	164	Yes the code is necessary, clearly current requirements are not adequately delivering necessary welfare and care benefits to pigs. But the problem is the code doesn't go far enough. The consultation report says that no alternatives for dealing with pig aggression and risks to piglets have been identified but clearly a more natural regime is necessary. However, clearly allocation of more space to animals is essential for better health and welfare for the sow and piglets can also only benefit, through having more space. More space must be available during the risk period in pregnant sows from heightened aggression levels as well – farmers should make separate cages for pigs that provide them more space and light, not just put them in tiny little cages that offer little better than solitary confinement. This is inhumane and unacceptable.	
	172	The code is non binding. To properly regulate an activity - you need statutory regulations that are monitored and regularly inspected, with penalties imposed for breaches.	
	174	Codes of Welfare are heavily influenced by the industry and would be better named 'Exemptions to the Animal Welfare Act'. My preference would be for a Ministry for Animals to be created, and for this new Ministry to have power to prevent intentional cruelty to animals. The flow on effect would be reduced social violence.	
	186	I think the code of welfare for pigs is necessary and provides an absolute minimum.	
	191	I consider a Code of Welfare necessary insofar as it holds pig farmers to higher standards than those already contained in the Animal Welfare Act. To have codes which instead exempt farmers from liability is immoral, illegal, and unnecessary.	
	193	I consider a code of welfare to be necessary to tell owners or people in charge of pigs what the minimum welfare requirements are for looking after these pigs.	
	200	Yes, a code of welfare is necessary.	
	201	Yes, a code is definitely necessary given the filming of disgraceful conditions on pig farms seen recently on TV. We cannot think of any other way to get the Pork Industry to put animal welfare on the same footing as economic gain.	
	204	I certainly consider that the pork industry needs some form of welfare regulation. The industry representatives' defence of practices such as the use of farrowing crates and sow stalls in the face of significant public concern suggests that self-regulation would not always achieve a standard of welfare which the public would consider acceptable. Mention is made in the preamble to the draft Code of 'imported pork produced to much lower welfare standards' – presumably such low standards happen naturally in countries where the imperative to make a profit can be pursued without constraint, however much it conflicts with animal welfare interests. There is no reason to assume the same situation would not arise here without regulation. In the absence of a code, standards of welfare for pigs could presumably be determined over time by case law as prosecutions of offences under the Animal Welfare Act are brought to court by MAF or	

		SPCA officers. However this is likely to be a slow process, especially given the level of resourcing available to bring such cases before the courts.	
	272	We believe that a code of welfare is necessary to provide standards and guidelines for the care and welfare of pigs.	
	273	I accept that a code is necessary to ensure the consumers of pork, the general public and pig farmers have a document that they can refer to in order to resolve the inevitable conflict between what farmers believe is good practice and what the public perceives to be good practice. Increasingly there are fewer and fewer urban dwellers that have any contact with the rural environment. There is a gulf between the airbrushed cute piglets of the movie Babe and the reality of the muck, smell and commercial imperative of life on the pig farm. Pig farmers need the code to protect us from ill informed and deliberately mischievous campaigns which target legitimate farming businesses.	
	298	Yes. A code is desirable to provide guidelines to pig owners as to how they can best meet pig welfare needs. A code is an essential source of authoritative standards based on evidence from scientific experimentation and persons experienced in pig health and welfare in order to counter other unsubstantiated standards perceived as being desirable. The latter are often expressed by well-meaning but ill-informed members of the public whose emotions have been stirred up by misleading information.	
Qn2	<i>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 pigs will be met? For example, do the minimum standards reflect good practice (not just current practice), current scientific knowledge and available technology?</i>		
	32	And yes, the minimum standards in this code are the minimum necessary. Alternatives to the suggested minimum standards are to ensure that the area pigs have to live in on a daily basis be large enough for them to socialise without stress due to small spaces, unable to take their own personal space if necessary. Large enough for them to run, play and behave in as natural a way as possible. Large and open with adequate shelter - paddocks, not stalls. Clean water and adequate food also available.	
	67	We DO NOT agree that the standards set out in this code are the minimum necessary to ensure that the physical, health, and behavioural needs of pigs. We feel that the continued use of sow crates and farrowing stalls fall short of best practice. The continued use of crates to confine indisputably intelligent animals such as pigs is unnecessary and cruel. Confinement of this nature for any length of time is imprisonment by any other name. Housing pigs in conditions as close as possible to their natural environment allows them to interact, form social bonds, and display natural emotions and behaviours. Free range farming is the only method of farming pigs that allows pigs to exist in such a natural environment.	
	71	It is the minimum standards that are to blame for the continued use of sow stalls and farrowing crates in New Zealand. The minimum standards need to ban sow stalls and farrowing crates, appropriate	

		measurement would be the quick banning and non use of these unnecessary confinement methods with bare concrete floors. Once the minimum standards reflect the requirements of the Animal Welfare Act 1999, then measurement would consist of unplanned inspections observing pigs exhibiting their natural behaviours.	
	88	The minimum standards are set too low. Pigs are social animals, but need space. The draft code correctly identifies the social hierarchy as a source of trouble - sub-dominant pigs need to be able to hide from aggressive pigs. Space is an obvious solution, otherwise obstacles that pigs can hide behind, or in. Another solution is to remove aggressive pigs - there is a wide range of response from individual pigs. Some are extremely aggressive, and some exert their dominance in a more restrained manner. Destroy the aggressive pigs. Maybe classical music would calm them down.	
	91	The minimum standards in this code do not go far enough to ensure that physical, health and behavioural needs of pigs will be met. In order to do this, NAWAC must uphold the principles of the Animal Welfare Act and enable pigs to express normal patterns of behaviour by banning sow stalls and farrowing crates. It is indisputable that these crates prevent pigs from expressing normal patterns of behaviour; they cannot even turn around, sit down, lie down comfortably or stretch their limbs. These cages are cruel and outdated, reflect poor practice and are out of touch with scientific knowledge about the physical and emotional capacity of pigs. Animal scientist expert Temple Grandin describes a pig's experience in a sow stall as being akin to a person spending their entire life trapped in an airplane seat.	
	101	I am appalled by the actual standards that constitute compliance with the current code. The minimum standards in this new code need to be strengthened, to ensure that cannot occur.	
	123	I do not believe that the minimum standards are adequate.	
	135	I think the minimum standards in this code are acceptable, not fantastic, but acceptable. They reflect the minimum of good practice that the public expect.	
	159	I found the draft submission to be extremely poorly written. My main concern is that the draft does not sufficiently prescribe the minimum standards such that they can be monitored by MAF inspection officers for compliance. Many of the minimum standards and their indicators use undefined language to describe the conditions. Undefined words are always open to interpretation and cannot therefore be used by inspectors to improve the conditions at farms or prosecute owners. This type of language in the document needs to be removed and replaced by concrete language.	
	172	No. Behavioral needs are severely compromised. Even the most basic of needs such as hay which provides mental stimulation and physical comfort are not required by the code.	
	174	No, I do not agree. There needs to be fuller consideration of the life of a pig. Get empathetic. How would you like to be treated? Go further in protecting pigs from a miserable life and death.	
	191	I do not agree that the minimum standards in this code are the minimum necessary. Sow stalls and Farrowing crates are extremely controversial, and NZ lags behind other countries such as the UK in	

		terms of banning these completely. In today's climate, good practice demands that ethical considerations are given as much if not more weight than financial implications. Having completed my BSc in Animal Behaviour and after many years working closely with many species (including pigs) it is beyond clear that the standards which this code sets are inadequate in maintaining the physical, health or behavioural needs of pigs.	
	193	I do not agree that the minimum standards in this code are the minimum necessary to meet the physical, health and behavioral needs of pigs. I believe the minimum standards suggested by NAWAC are well below what is necessary to ensure the welfare of pigs.	
	200	I don't think the minimum standards in the code will ensure the physical, health, and behavioural needs of pigs will be met. The minimum standards allow the use of farrowing crates and sow stalls for long periods of time - how can being confined like this provide for the pig's needs? An alternative management system has already been found - that of managing pigs outdoors, providing adequate shelter and nesting areas, and managing aggression problems using fencing rather than cages. Current examples of free-range farming have proven that it is possible to do this and have a successful and viable business.	
	201	Yes, the minimum standards are the minimum acceptable to most consumers. However the time given to allow farmers to change is totally unacceptable. 2012 to change the facilities for dry sows is ludicrous given we have all known of these cruelties for years. We stopped buying pork 5 years ago except for free range bacon having read and seen photos of pigs in disgraceful conditions.	
	204	Many of the new 'statements of welfare outcomes', which are the new minimum standards, are simply statements of common sense (some exceptions considered above). The preamble to the code makes reference to the shift away from 'prescriptions of husbandry practice', but does not explain the reasons for this change, nor how it fits with the intention of the Animal Welfare Act that the codes should provide the detail and baselines for animal management and care in New Zealand, guided by the provisions of the main legislation. In the final code or any accompanying documentation, please include a comprehensive explanation of this significant change of approach. While a very high level of specificity makes for an unwieldy regulatory document unable to accommodate new research findings or change in public attitudes, there is a real risk that insufficiency of detail will disadvantage the animal welfare cause. The less prescriptive the standards are, the greater the potential for animal welfare abuses to be perpetuated while opposing parties seek legal definition of what constitutes compliance with a relatively loosely defined welfare outcome. And the outcome of any legal challenge relating to the compliance of a particular piggery with particular minimum standards may have more to do with who can afford the best legal representation than with points of animal welfare. Further, the implicit understanding that the precise details of what constitutes compliance with a minimum standard can be defined later on an as-required basis, disempowers the public for whom this submission process represents the only opportunity for input	

		<p>into pig welfare in New Zealand until the next review of the code.</p> <p>Some requirements for welfare, even if they may be considered to be implicitly prescribed by the minimum standard statement of welfare outcomes, are regarded as too critical to an outcome and 'non-negotiable' to be omitted from the minimum standards, given that these are the most legally binding parts of the code. It is suggested that the provision of rooting material and/or other environmental enrichment, and of appetite-satisfying bulk feed, are in this category.</p> <p>But NAWAC's question assumes that if we get it right with the minimum standards, then these will ensure that the physical, health, and behavioural needs of pigs will be met. A larger question around the adequacy of the standards is not their format but the likely level of compliance and/or efficacy of any sort of enforcement. How will these welfare outcomes be assured? There are only five fulltime MAF Animal Welfare Investigators, and despite the capacity to call in other agencies and casual staff for support where required, it is difficult to see how sufficiently regular inspections for compliance with the code can be resourced and the standards enforced. MAF acknowledges in its Statement of Intent 2009-2010 document that its programmes (the codes of animal welfare are specifically mentioned) rely upon high levels of voluntary compliance and participation. The nature of indoor intensive pig farming means that the public is even less able to report observed breaches of animal welfare standards to the appropriate authorities than is the case with animals routinely farmed outdoors. Therefore, other than illegal break-ins of the kind which featured in the Close-Up television programme last year, the public must rely on licensed inspectors to ensure that the welfare standards set by the code are being achieved. A description of how this happens / will happen would have been a useful accompaniment to the draft code, but would still be an enlightening component of the post-submission discussion document or final code preamble.</p> <p>Those parts of or omissions from the minimum standards which are not considered to reflect good practice, current scientific knowledge and available technology are discussed above. But as a general comment it is difficult to gauge whether the minimum standards reflect these elements because the draft code and associated documents contain no synoptic review of these factors (notwithstanding MAF's contention that its Animal Welfare Group develops sound, science-based policy and standards) nor reference list which would enable those commenting on the draft to verify the inferences drawn from the research and other information sources used. Industry practitioners are likely to have the best idea about whether the minimum standards proposed 'raise the bar' on current practice, but are probably as much in the dark as most others about the scientific basis of the few specifications of detail (e.g. minimum standard No 8(b) - ammonia levels not to exceed 25 ppm), while reference to available technology in the discussion or the standards is minimal.</p>	
	273	<p>No code can ever anticipate all of the situations that arise. If the code is too prescriptive then it risks being used to justify situations that may worsen outcomes. For instance the standard dry sow stall of the 1980's is now too small for the modern sows which are larger than we used to farm in the '80s. The outcome is what is important. We must be careful not to impose human wants and needs on to</p>	

		<p>our animals. My experience with outdoor sows has shown that our perception of comfort is certainly not the same as the pig's perception. An urban dweller seeing a filthy sow after rolling in a wallow on a cold frosty morning, seeing new born piglets out in the cold rain, seeing pigs choosing to sleep in a pile rather than spread out, seeing a dominant sow in a large field ruling with the aggression of a mafia mobster, watching a sow eat still born piglets – would class all these examples as poor welfare. Yet they are all natural preferred behaviours that represent very good welfare. Any prescriptive standards in the code must be viewed as providing an indication of what most farms would consider to be good welfare. But ultimately the decision of what constitutes bad welfare must be based on what the effect is on the pig. Is the result good in terms of welfare even if the conditions are not exactly as prescribed in the code?</p>	
	298	<p>Generally, yes, the minimum standards reflect good practice (not just current practice), current scientific knowledge and available technology. However, there are some with which I disagree and some that may be difficult to achieve as I suspect they have been formulated without recognition of all ramifications.</p>	
	299	<p>NZPork fully supports the assessment of the overall welfare status of the animal and the development of 'outcome-based' standards. However, NZPork has a number of particular concerns about the drafting style and approach contained in the minimum standards and the 'example indicators'.</p> <p>Minimum standards are sometimes vague and subjective. The clarity and objectivity of the minimum standards varies considerably and this makes it very difficult to establish compliance with some of the more vague and subjective minimum standards. NZPork notes this is a matter of considerable concern for producers as it makes it difficult for them to be confident they are complying, and potentially gives rise to significant variations in how such standards may be interpreted by an enforcement officer.</p> <p>NZPork recognises that this matter is part of a wider issue relating to the role of codes, the approach to the setting of minimum standards in codes, and the animal welfare enforcement function. In our view, further consideration of this whole issue is required. At a minimum, we consider drafting style and approach regarding the minimum standards in the Draft Code could be improved substantially. We believe the clarity, objectivity and enforceability of minimum standards is an issue that will need to be addressed at some point in time. While NAWAC does not have an enforcement role, it is clear that one of the purposes of a code of welfare is to establish minimum standards and that such minimum standards are intended to set a threshold for the animal welfare offences in the Act (see sections 68(b) and 13 of the Act). The issue is of most concern to producers (in terms of certainty that they comply with the relevant standards) and MAF Enforcement (in terms of public enforcement of the Act) but the remedy lies with NAWAC (in terms of drafting clear and objective minimum standards).</p>	



Qn3	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?		
	62	There are many problems with the example indicators provided in the code. In many cases they are methods rather than indicators. Indicators would be some assessable measure of the outcome desired rather than the means by which the outcomes may be achieved. The indicators need to be reworked as real indicators of pig well-being and those that are methods can be included in the general information provided. All the example indicators in the draft Code should be reevaluated as to their suitability as indicators of pig welfare.	
	65	The indicators could be expanded but in their present form are useful guidelines. As a pig farm auditor there are a number of additional indicators that I would use but it would be inappropriate to try to list them all in the Code. It should be borne in mind that every farm is physically different so that indicators will be wide-ranging.	
	67	The indicators given are reasonable in the circumstances. We have concerns that once "minimum standards" are set, the actual industry standard will be lower than is set out in the code. We see this "defacto standard" in other aspects of NZ life, for example the purchasing age for alcohol. While the standard is 18 years, the actual defacto standard is more like 15 or 16 years of age.	
	88	Physical indicators are fine to measure physical health, but the mental health is always going to be hard to measure. If they don't show signs of repetitive behaviour, look relaxed, and socialise normally then one would consider them normal, and healthy.	
	91	The example indicators do not place enough of an effort on minimum humane standards and the well-being of pigs. It is the job of NAWAC to ensure these are met, yet they are failing to do so. Pig welfare should be the primary concern.	
	123	I do agree with the indicators. However, as I find minimum standards inadequate in places, indicators need to be adjusted accordingly.	
	159	Very frequently words like "acceptable norms for the industry" (p9 of the draft doc) are used to describe indicators for minimum standards. This is like getting a fox to guard the chicken house! In no circumstance should any industry be responsible for setting the standards by which it is required to adhere. The fishing industry is a good example where MFish set the quotas not the industry. I will deal with many of the standards separately below. Many of the minimum standards and their indicators use undefined language to describe the conditions. Undefined words are always open to interpretation and cannot therefore be used by inspectors to improve the conditions at farms or prosecute owners. This type of language in the document needs to be removed and replaced by concrete language. The minimum standard indicators are frequently NOT reflected in the minimum standards words. The indicators of the standards appear "tougher" than the actual minimum standards.	
	172	No. Many of the indicators are not quantifiable, and couched in very general terms. Non compliance	

		would be difficult to establish. For instance - unnecessary vocalising. Who would determine/measure this? How could this be measured? It comes down to interpretation, and opinion.	
	178	Example Indicators do not always reflect the requirements of the Minimum Standards. They are also inconsistent grammatically. They should all be sentences.	
	193	In the draft code NAWAC replaces prescribes husbandry practices with statements of welfare outcomes to be met. I disagree with this and believe that statements of welfare outcomes to be met should be on top of prescriptions of husbandry practices and not instead of these. This is because certain husbandry practices will always result in negative welfare outcomes for the pigs so should be banned immediately.	
	200	Yes the example indicators are appropriate.	
	204	Most of the example indicators appear generally reasonable. However many are very ill-defined, using words like 'low', 'unnecessarily', 'undue' or 'excessive' without defining what these mean in this context. Others are too industry-friendly. For example the first and second indicators for minimum standard No 3 require a number of welfare indicators to 'fall within acceptable norms for the industry'. What protection does this afford the piglets? Although a few rogue operators could potentially fall foul of these indicators (perhaps more for reasons to do with industry politics than anything else), it is mainstream practices which a significant sector of the public has issues with and desires to see change. As with the minimum standards, some of the indicators make one wonder immediately about how compliance will be achieved. For example, an indicator relating to minimum standard No 1 is that 'Evidence of training/competence can be demonstrated'. How? To whom? Who can/will check that this indicator (and any /all the other indicators) is being achieved at any particular piggery, and at what frequency, and will the findings of such reviews be available to the public? Essentially these comments extend concerns expressed in response to question 2 about the new format of the minimum standards – many of the example indicators are also relatively loosely defined. Some indicators are effectively useless because the minimum standard they relate to is so hedged with qualifiers as to be essentially meaningless. Minimum standard No 9 is a good example of this.	
	273	The code is very good at identifying indicators that can be used to assess welfare.	
	298	Generally, yes; except MS 11 for outdoor arks.	
	299	NZPork has a number of general concerns about the inclusion of 'example indicators' in the Draft Code. NZPork is concerned that there are a number of fundamental issues raised by the use of example indicators and considers that further time should be given to develop a more consistent approach to the use of example indicators. For example, indicators vary widely in the following ways: from the subjective to the objective; from minimum standard to aspiration or guidance (or sometimes even close to best practice); from easy to establish compliance with through to impossible to establish compliance with.  If the example indicators are to fulfil their intended role of assisting to determine whether a person is complying with a minimum standard, they need to be drafted in a manner that is more objective and	

		ties them more closely to the minimum standard so that it is clear when the indicator, and so potentially the minimum standard, has been complied with.	
Qn4	<i>4. Do you agree that the recommendations for best practice in this code are appropriate?</i>		
	62	The best practices should be the minimum standards. If we know a better way to achieve the desired welfare outcomes these should be required rather than optional. The Code should require best practice rather than allow the minimum necessary. Thus, best practice would have the same legal status as the Code. The whole Code needs to be reconsidered in terms of making the best practices the minimum requirements.	
	67	No, we DO NOT agree with all the recommendations. Specifically, we absolutely reject the continued use of farrowing crates and sow crates. This abhorrent practice is banned in the UK & Sweden, and being phased out in Finland, Switzerland, Netherlands and Denmark. If these countries can farm pigs without the use of crates, so can we. As a first world country we are appalled at the use of sweat shops to manufacture garments in the developing world. Similarly, child labour is seen as a terrible practice where ever it is found. Why then should we accept the inhumane housing of pigs solely for bigger profits? It's time animal welfare was pushed ahead of money in this industry. We spoke with a farmer of free range pigs. It was his opinion that the continued use of crates in pig farming was an economic decision and not one of animal welfare. One can conclude that the use of crates is intrinsically linked to profits for some pig farmers, despite their arguments that pig aggression and the smothering of piglets is the reason. Free range pig farms are the answer. We want no crates, not "nicer crates".	
	71	Recommendations for best practice in this code are appropriate when pigs are able to exhibit their natural behaviours.	
	88	Best practice should mimic the pigs natural environment; any deviation would therefore not be best practice, unless it were to improve the pigs environment. The only problem with the best practice recommendations is the acceptance of farrowing crates. They should never be part of a best practice code.	
	91	No. Sow stalls and farrowing crates need to be banned altogether, and immediately.	
	101	I support the best practice recommendations in the code. Many of them I would in fact regard as appropriate minimum standards.	
	123	Yes, I do agree.	
	200	Yes.	
	204	Presumably the measures listed as recommendations for best practice are considered achievable rather than representing any sort of unattainable ideal. Therefore as a general comment the more that can reasonably be included in the minimum standards, since these are the only sections of the Code to have legal effect, the better.	

	273	I think you have got the best practices well identified in all areas except for the eventual need to dispense with dry sow stalls by 2017. I also question your statement that farrowing crates are not in the best interest of the sows.	
	298	Again, generally yes, but there are two exceptions, re: behaviour given above.	
	299	NZPork has already commented on NAWAC's confusion in the Draft Code between minimum standards and aspirational best practice (see submission). This is in contrast to NAWAC's coverage of inductions in otherwise healthy cows. In this case NAWAC has stated clearly that it does not support the practice, and this is included as a recommended best practice given, among other things, the justification that "It was noted that the dairy industry is already making clear moves away from the induction process" (Refer Animal Welfare (Dairy Cattle) Code of Welfare 2010 Report, p 16.) Coverage of Indoor Housing is also in marked contrast (refer Animal Welfare (Dairy Cattle) Code of Welfare 2010, pp 17 and 18. It is noteworthy that minimum standards relate to the requirements to lie down and rest comfortably for sufficient periods each day "to meet their behavioural needs' – for which no analysis or discussion is provided.	
Qn5		<i>5. Do you believe there should be a standard on the minimum amount of light pigs should receive?</i>	
	32	Pigs that live naturally in the wild have exposure to light on a daily basis. Light and sunlight are vital for a healthy immune system. Denial of light/sunlight is depressing for animals just as it is for humans. You only have to observe animals in a field snoozing, lying down stretched out, on a warm sunny day, to see how much they enjoy the sun after a dark, cool or wet day or night. They look content. Shelter that is accessible to them is also important so they can be away from too much heat or cold windy weather if necessary.	
	65	There should be reference to a daily light exposure periodicity. In indoor units lighting in weaner accommodation is often only turned on when staff are checking the pigs. This may be for less than 1 hour per day. Because pigs raised in the dark are less mobile than they would be in normally lit conditions, they grow faster; this work was done in Britain in the 1980's. However they also have less opportunity to investigate their surroundings or display normal social interactions. Earlier versions of the pig code required that pigs of all ages had lighting that mimicked day and night periodicity.	
	67	Yes we believe that there should be a minimum amount of light pigs should receive. The minimum should be natural unfiltered sunlight, from sunrise to sunset. Providing pigs with an outdoor environment where they receive natural sunlight has to be cheaper than any amount of artificial lighting.	
	71	A standard on the minimum amount of light pigs should receive would need to be specific to the pig breed as factory farmed and incarcerated pigs are unable to cope with as much light as those breeds that get to enjoy natural light. Appropriate temperature is also integral with light levels. Overseas pig farms where sow stalls and farrowing crates have been banned may well have already researched	

		and be using appropriate light levels that are breed specific.	
	88	Interesting question. I have no idea how much light would be appropriate. They should be kept in such a manner that they self determine their light exposure - provide them with dark areas.	
	91	Yes. For pigs to be given the "opportunity to display normal patterns of behaviour, as required by the Animal Welfare Act, they need to be able to live in natural conditions, and this includes the opportunity to live with a normal amount of light. Dark conditions only add to the stress of these already suffering animals.	
	101	For pigs housed indoors, there should be a minimum standard for the amount of light, and best practice would be natural light for daylight hours. I agree there needs to be sufficient ventilation to ensure air quality is not offensive to a human, and that both light and air quality need to be assessed at pig level.	
	123	Pigs should be provided with light to reflect 24-hour day cycles and seasonal changes. Pigs, like all other living organisms, have evolved over long periods of time. This has led to the development of distinctive activity patterns and biological rhythms that are mainly affected by available daylight. Pigs would be more likely to exhibit a varied behaviour repertoire if provided with a natural light cycle.	
	164	There should be light standards required.	
	172	Pigs are intelligent sensitive animals, but do not generally have good eyesight. 20 lux constitutes a very low level of lighting. This standard would greatly hamper the ability of pigs to find food and water. As such it impacts upon their ability to carry out natural behaviors. Such low lighting conditions are unnatural and would affect the pig's wellbeing, Pigs should experience natural daylight of at least 100 lux during daylight hours, and artificial light should not be permitted, particularly outside of daylight hours. Producers will take advantage of artificial light if permitted as this enables better control of temperature, however this can be met by standards requiring higher or more efficient levels of ventilation.	
	174	Light is critical for pig health and wellbeing, as it is for all animals.	
	200	Yes there should be. That standard should reflect what is currently known to be best practice. Ideally, pigs should receive natural light during the normal hours of daylight. As a minimum, they should receive some natural daylight every day.	
	201	Yes we do believe there should be a standard on the minimum light pigs should receive, surely the pork industry has done studies on optimum conditions including lighting?	
	204	No reason is given as to why this factor has been singled out for specific consultation. The Pig Site recommends 16 hours per day in lactation at a 360 lux level, but this is so dissimilar to the 20 lux draft minimum standard as to suggest that the two situations are in some way not comparable. Certainly there needs to be sufficient lighting to permit regular inspection of the pigs' condition.	
	273	I do not believe that there is any need to maintain 20 lux for long periods other than that required for inspection. Pigs are quite happy in dim light and if given a choice they will choose dull light over full sunlight. I see no reason for daytime lighting levels of less than 20 lux but would not be qualified to	

		set the lower limit. I would not agree to anyone housing pigs in permanent darkness.	
	298	We need to be careful here – how can 20 lux be guaranteed in an outdoor ark on a day when outdoor visibility is down to 50 metres?	
Qn6	<i>6. What barriers do you see to the implementation of the proposed code and how might they be resolved?</i>		
	32	I see the barriers to the implementation of the code being denial of animal needs by farmers, reluctance to spend money on better care and standards, possibly lessening their own profits. Ignorance and stubbornness may play a part along with the fear of change. Obviously cost will have a bearing.	
	39	Any barriers to the implementation would be a willingness to give in to the the Pork Industry Board who are more driven by greed or farmers not wishing to adhere to the Code, retailers who wish to promote anything that will sell regardless of its origin or the methods employed to get it to retail in other words 'lack of best practice'.	
	65	The pig industry is, and always has been, a struggling industry financially. The cost of compliance with relation to space and stalls will cause more responsible pig farmers to exit the industry than the economic analysis has allowed for. Less responsible farmers will continue as they have in the past and there is no effective way to control their operations. Until wholesalers require welfare standards as a part of their supply agreements, a significant number of pig farmers who have small operations will continue to ignore the Code. Unfortunately many of the 'backyard' pig farmers have arrangements with local butchers so that not all pigs will be processed through the wholesalers; the net would need to cover rural butchers etc. as well. In the end education is still NAWAC's best tool and NAWAC should be seen to encourage best practice rather than force it.	
	67	The largest barrier to the implementation of the pig code is the Pork Board. They know how to "squeal like a pig" when they feel their profits are on the line. We have already seen them threaten legal action over this Code of Welfare, and we have no doubt that they will utilise their economic muscle to try and influence the Code's final form. NAWAC has already acknowledged that sow stalls must be phased out. So we all agree that these farming methods are unnecessary and cruel. Once this is accepted, we are only arguing over timing. If sow stalls are cruel now -make them illegal now. If the pork industry is allowed to carry on using these sickening methods there is no urgency to force change. We want change in the way pork is produced in New Zealand. Ban the use of farrowing crates and sow stalls in New Zealand immediately.	
	71	I see the NZ Pork Industry Board as one of the greatest barriers as they have already delayed release of the draft to the public from December 2009 to March 2010. The Pork Board by its nature must have conflict of interest in any of its suggestions and an agenda with profit as its primary concern. This barrier could be resolved by giving less weight to Pork Board proposals as well as careful scrutiny.	
	88	The pork industry. Pig farmers need to get a bigger slice of the pie. Too many middlemen making	

		money out of farmers hard work. If pig farmers receive a higher income they will be more amenable to the sorts of changes we must implement.	
	91	In order to ensure that the Animal Welfare Act is complied with, our government needs to provide more funding to the RSPCA to ensure that the code is enforced and that basic welfare standards are being met. Currently, the RSPCA relies largely upon public donations to fund prosecutions, resulting in many animal welfare abuses being ignored.	
	123	The Pork Industry Board will be the main opposing body to this code, in particular reducing the use of and the ban of stalls. Juggling from previous correspondence with the Board and numerous media releases, the Board is mainly concern with economics and do not appear to accept scientific evidence or take into consideration any ethical and moral obligations. The Ministry of Agriculture can also be a barrier. The Ministry should review the code objectively, taking into consideration all aspects of the debate and not be pressured by the Pork Industry Board and its economic slant.	
	133	The cost to farmers of changing to humane systems of pig farming should be passed onto the consumer with a message informing the public of the reason why. The purpose of the Animal Welfare Act is to alleviate animal suffering not that cruelty is acceptable if the animal is being farmed commercially.	
	200	The proposed code does not go far enough to providing adequate welfare for pigs so I can't answer this.	
	201	The only barriers we see are pig headed farmers if you will excuse the pun. Just as the dairy industry has backward thinking farmers polluting our rivers there will be pig farmers who will always do exactly what they have always done with no thought whatsoever to animal welfare.	
	204	It is considered that the primary barrier to the implementation of the proposed code likely to be one of compliance and enforcement (discussed in response to Question 2 above). While it is accepted that many in the industry have the will to improve pig welfare, there will be a significant sector who work to the lowest common denominator, responding only to regulatory change and enforcement.	
	273	Financial barriers. Current profitability is not high enough to justify further investment. Resource consent barriers. Climate and land availability for outside pigs in the North Island. Deep litter supplies for group housing.	
	298	The biggest impediment is acceptance by anti-pig-farming campaigners. A second impediment is poor acceptance and support by politicians who are excessively aware of the voting power of anti-pig-farming lobbyists.	
Qn7	<i>7. What benefits do you see from having this code? Benefits may include, for example, increased certainty about animal welfare requirements or market gains.</i>		
	32	Benefits to the new code providing it is adequate to really address pigs' natural needs and welfare include obviously happier less stressed pigs. The percentage of the population that actually cares	

		about animals will be relieved and may even eat pork again. Farmers may begin to rethink some of their other animal husbandry practices which could be beneficial to other aspects of animal farming.	
	39	Benefits would be the ultimate comfort of the animals, their life, housing, feeding, non-crowded transportation and humane method of slaughter. The benefits to humans would be in actually knowing these practices have been put in place and are monitored on a regular basis resulting in a better table product and labelling to testify to this. The majority of New Zealanders would like to see all pork on retailers shelves to be that of New Zealand free range pork something quite achievable as some farmers have already proved and certainly not a New Zealand or overseas product that was produced under inhumane methods.	
	65	As stated "increased certainty about animal welfare requirements or market gains."	
	67	The Code provides a yardstick for the welfare of pigs. The minimum standards outlined in the Code will determine how well, or poorly, New Zealand is perceived by our trading partners and other countries. Allowing the continued use of crates and stalls in NZ must surely rank our pork producers behind the more enlightened countries that have discontinued this practice (UK, Sweden). NAWAC has the opportunity to ensure NZ pork producers are ranked in the top echelon of pork producers worldwide by following international best practices by immediately banning the use of crates and stalls.	
	71	Benefits of an appropriate Code of Welfare will include increased certainty about animal welfare meeting the Animal Welfare Act requirements.	
	80	There will be incentives for following the code, if failure to meet minimum standards may be used as evidence to support a prosecution under the Animal Welfare Act 1999, and following or exceeding the minimum standards can be offered as a defence. The Pork Industry Board Chief Executive Sam McIvor has said that 45% of pork consumed by New Zealanders is imported, and is not required to meet New Zealand welfare standards. Strict adherence to the code will create a point of difference from these competitors, which can be used to market New Zealand pork, both in New Zealand and overseas, as a healthy, ethical choice.	
	88	People will be reassured that the pork they eat is from well treated animals. It will provide farmers with a measure to compare against the way they treat their animals. It would provide the courts with the same sort of measure. Another benefit would be the demonstration to overseas markets that pigs can be farmed humanely plus it would give our pork a competitive advantage in a world market in which treatment of animals is becoming more important.	
	91	The proposed code is ethically deficient as it still allows the use of unacceptably cruel confinement systems (sow stalls and farrowing crates). However, were these cages to be banned altogether, we would have much greater certainty that the most basic animal welfare standards were being met.	
	101	Advantages of the code, in my opinion, are certainty about minimum standards of humane treatment (and, therefore, acceptable farming standards), and consistency with New Zealand's brand. Whether or not it results in market gains, I consider that animals need to be housed and cared for to an	



		acceptable level, that allows them to express the full range of natural behaviour. That is the direction the domestic and international markets are moving.	
	123	Most importantly, the code is likely to minimise unnecessary suffering and maintain minimum standards of care. These standards will be applied nationwide and will ensure that farmers and individuals can be held accountable if they do not meet their obligations.	
	164	Improving animal welfare standards for pigs will benefit and impact positively on not just pig quality of life and living conditions but encourage consumer confidence and market share including a premium for ethically produced pig meat. That means that pigs benefit as do consumers and farmers and the meat industry and economy.	
	198	I do not think that the Code will create increased certainty about pig welfare requirements, because the requirements around pig housing are phrased in terms of physical and behavioural indicators. I think specifying minimum sizes for pig housing stalls such as sow stalls and farrowing crates would help to create greater certainty.	
	200	The benefit of an adequate welfare code is that the welfare needs of farmed animals are clarified and enforced. Most consumers of meat would like to believe that the animals they eat were healthy and had good lives. These ethics need to be promoted. A welfare code encourages the concept of treating animals with respect and care rather than simply as fast food. This code in its current form will not provide any certainty about the welfare of pigs because its minimum requirements are inadequate.	
	201	Benefits could include more NZers buying pork and refusing to buy imported meat.	
	204	Assuming a reasonable level of industry compliance, the benefit of having this code will be that some of the worst of the various potential animal welfare abuses which feature in the pig industry will be reduced.	
	273	Long term certainty about the acceptability of housing styles allowing farmers to invest for the long term As a basis to resolve complaints from the public who have a different perception of welfare. As a benchmark for the pork industry to make the claim that our farms are more welfare conscious than those overseas farms from which our imports come.	
	298	Good pig welfare. A standard that is irrefutable. This benefits pig farmers as well as the general public.	
Qn8	<i>8. What impacts do you think this code will have on New Zealand society, the economy, and the environment?</i>		
	32	New Zealand will gain respect from other countries which may even repeat the more humane practices. Just as freerange eggs have grown in popularity, so will freerange pork. I stopped buying all pork products some years ago until Freedom Farms came on the scene with their free range pigs. People such as myself are happier to pay a higher price to support the efforts of farmers who care about their livestock. I am not well off financially, but I am prepared to go without something in order	

		<p>to make a point or in order to have something of greater value. Many people are just not informed about how food gets to the supermarket shelves. And of course some do not care, but this is no reason not to make humane changes for the animals ie. pigs in our care. A brief explanation on packing or notice at supermarket counters can alert people to the changes in pig farming and in this way will explain extra cost. Education is helpful as so many people are unaware of the true cost of food to the environment, to animals and ultimately to the planet.</p> <p>Having travelled the South Island last year and spoken to many tourists, I found out that the big attraction in coming to New Zealand is about the beautiful environment and doing things as naturally as possible without causing harm or discomfort to land or animals. People are becoming more aware of where food originates from and beginning to make conscious choices. Naturally if people know animals are well cared for and valued and respected, then they will feel better about what they eat and be happier also. Everything is connected.</p>	
	39	Impacts of the Code if enforced could be huge world wide as more and more people wish to have natural food in their diet and know that the origins were free range, organic and best practice methods were employed. New Zealand could have been a world leader in this respect instead of lagging behind. But its not too late to rectify the situation you are heading in the right direction by updating the Code and calling for these submissions and as long as they are acted upon New Zealand could be supplying the world with the ultimate product, our animals would be happy for their short lives, consumers and non-consumers would be happy knowing they were.	
	65	Very little on any of the points. The economy could be impacted if the application of the code causes an increase in the amount of pig meat imported. The British pig industry suffered severely from the imposition of welfare standards that were more stringent than those of exporting countries. The recent improvement in pig farming in Britain has been the result of country-of-origin labeling but I sense, through verbal contacts with the British pig farming community, that there has been a concomitant 'easing' of the application of some of the welfare standards that were imposed.	
	67	New Zealand is already heavily marketed on its clean green image. However, the use of 1080, polluted waterways, dirty dairying and other questionable environmental practices cast a shadow over our image. If sow stalls and farrowing crates are continued to be allowed, how do we justify this abhorrent practice against our clean green image?	
	71	Impacts on New Zealand society would be a clearer conscience, belief in the ability to make and achieve a difference, important precedences in animal welfare as examples to our children and other countries. What price do you put on acceptance of animal cruelty and suffering?	
	88	Any society which permits animals to be maltreated lacks moral and ethical authority. The welfare code would demonstrate that New Zealand is serious about dealing with inhumane treatment of animals, but the problem of pig-hunting will be an anomaly. We allow hunters to use dogs to savage pigs, then stick the pig(s) with a knife while on the other hand we require farmers to treat pigs in a	

		<p>humane manner. Incongruous. Economic concerns are not a problem as people are obviously prepared to pay more for "free range" pork. If we are truly concerned about the importation of pork then we would require importers to prove that the meat has been sourced from suitable farms. The impact on the environment would be mixed. Free range pigs require more space, therefore more land. On the other hand effluent disposal would be more efficient, and less likely to cause pollution. Smell would be less of a problem. The free range farmer would be less reliant on grain based feed. Farmers would be wise to plant productive trees, such as oaks, which will reduce feed requirements and absorb carbon dioxide. I grow Macadamia trees and the pigs are useful for disposing of small, or damaged nuts. Macadamia finished pork - a fine marketing strategy. I also have Black Walnut trees, and the nuts are enjoyed by the pigs, with the prospect of income from timber when the trees are old enough - something I may not live to see, but I like to think ahead.</p>	
	91	<p>As previously stated, the world is speaking against factory farming. The European Union legislated against sow stalls back in 2003, and following California's lead in 2008 with Proposition Two, six U.S. states have banned sow stalls. These jurisdictions have instead enacted laws requiring that these animals be able to stand up, turn around, lie down comfortably and stretch their legs. If we fail to follow to their footsteps, New Zealand will gain a reputation as a country which does not care about animals or the environment, and this is likely to hurt us economically. This became evident last year when New Zealand dairy farmers proposed to start factory farming cows: submissions against these proposals came from places as far away as Germany and the U.K, and companies such as Tesco's supermarket chain in the U.K publicly stated that they would no longer purchase New Zealand dairy if the proposals went forward.</p>	
	101	<p>I have noted the drafted economic analysis, and its assessment of impacts on pigmeat prices, availability, and risk of import substitution. I consider that these costs are negligible, relative to the benefits (even if there are not any market benefits).</p>	
	123	<p>New Zealand can market itself as a country with high welfare standards, which can lead to better market gains in the future. This is especially relevant in times when the general public is increasing aware of the welfare implications of farming. Consumers (nationally and internationally) are being exposed to and educated on the subject of animal welfare and are likely to take this into consideration when choosing a product. Note: Our understanding of domestic animal behaviour and welfare has been greatly enriched in the last two decades through numerous scientific studies. To ignore this knowledge is to refuse progress, both moral and scientific. Humans are the only species that can exploit other social species on large scale, with this ability should come responsibility. The laws on animal welfare should be based on scientific studies rather than the preferences of farmers.</p>	
	174	<p>This code, if accepted in this draft, will perpetuate continued mistreatment of pigs and does not go anywhere near providing adequate protection for them. The influence such a weak code will have on New Zealand society is that the obvious hypocrisy with the government wanting to reduce violence and cruelty on one hand, and wanting to perpetuate it on the other (in this case for the pigmeat</p>	

		industry), will continue to pollute our social system, and cause ongoing social grief. As for the economy, New Zealand is very well positioned to be farming edible crops. The government would do well to encourage this direction instead of propping the 'old school' meat industry, with its ethically corrupt practices.	
	191	This code will be confirmation of NZ's loss in the so called "clean green" stakes. It is beyond disappointing how this country has lost its moral "x" factor. NZ society wants to see pigs in better conditions - the only people opposed are those who stand to profit. Confirmation of this code will be demoralizing to the citizenry, damaging to our national pride and reputation.	
	200	The code in its current form will have little impact on pig farming. If the minimum requirements for housing were of a higher standard (i.e. sow stalls and farrowing crates banned) the impacts on society would be positive - the pig farming industry would adjust to more humane practises, pig products might be more expensive, and people would place a higher value on meat products rather than taking them for granted.	
	201	It would dramatically reduce the risk of loss of markets due to perceptions of cruelty. The need to preserve our 'clean green image'. We argue against whaling using inhumane ways of killing a very intelligent animal but keep pigs, very intelligent animals in substandard conditions.	
	204	New Zealand will be able to demonstrate to its trading partners that it has an ongoing interest in animal welfare in the pig industry, albeit not to the level of some others. In the short to medium term there will be some small economic cost to the country associated with the reduction in use, then discontinuation, of sow stalls, but in the long term higher standards than some other countries is likely to help our trading profile. Not enough information is provided to assess environmental impact.	
	273	Reduced income for pig farmers, greater imports, more illegal backyard units which are not welfare or effluent compliant. Less control over our food. Less employment of NZ workers	
	298	It will only be beneficial if NAWAC can stamp its authority on the Code, and convince politicians and the public that the standard is not 'feathering the nests' of pig farmers.	

#### Comments on Economics.

Sub 15 The accompanying economic analysis is instructive. Arguably, its short comings include a lack of financial data from non-crate producers. However it is a rather rich analysis of the cost of change, and the cost of the pace of change. It seems robust, and it has certainly attempted to be comprehensive. Its main contribution is to dispel myths – about the level of exit, bankruptcy, price, imported product and so on.

- Sub 65 NO! I consider that it is a weak document that was hastily compiled by persons who are unfamiliar with the New Zealand pig industry. It does not take due account of the dynamics of supply and demand with respect to the ready availability of relatively cheap imported product. There is no doubt that if the requirements of the code with respect to space and stalls are enforced, a number of farmers will exit the industry. In my opinion the analysis underestimates the number of sows that will be culled (as opposed to the number of farmers who will exit) and thereby the amount of locally produced pig meat that will disappear. The result will be a significant increase in the amount of pig meat that will be imported. This problem will be exacerbated by the intention of MAF Biosecurity to allow increased importation of high value cuts of pig meat. An example of the consumer response to pricing can be taken from the effectiveness of 'specials'. Whenever pig meat stocks rise in wholesaler's chillers, the wholesalers encourage supermarkets to promote 'specials'. Invariably huge amounts of pig meat are sold through these 'specials' indicating the degree to which consumers are motivated by price. The analysis did not appear to examine this aspect of consumer demand. I believe that the analysis should be re-worked with someone such as Professor Roger Morris being used as a consultant.
- Sub 84 I commend the authors of the economic analysis for showing so clearly that the economic effect of a ban on sow stalls would be negligible. I do however suggest they also look at the effects of a ban on the overall economy, which is likely to be positive.
- Sub 91 1. Do you agree that the draft economic analysis has adequately taken into account all necessary factors? If not, what else should be included?  
No. By failing to ban sow stalls and farrowing crates, the draft code has put the interests of a small number of pig farmers above the well-being of pigs and the interests of consumers. This is unacceptable. The code needs to comply with consumer demands and common decency by banning sow stalls and farrowing crates altogether. As long as these crates are allowed, minimum humane standards have not been met.
2. Are the assumptions in the draft economic analysis reasonable? Some of the main assumptions include the cost to farmers of converting and operating their farms, consumer responsiveness to increases in pigmeat prices, and the degree of overseas competition and import substitution. If not, what assumptions do you suggest? Please state your reasons.  
The assumption based upon import substitution is unreasonable. Firstly, while it is true that pig meat from overseas is imported to New Zealand, this is no excuse to treat pigs so poorly within our own country. As Auckland Mayor John Banks says, "pigs have the right to live their lives with dignity." Secondly, most of the countries who export their pig meat to New Zealand have already, or are in the process of, phasing out these cruel confinement systems. As previously stated, it is time New Zealand kept up. Too much weight has also been put into the costs to farmers of converting. As John Banks has pointed out in the past, we don't even treat our worst criminals like this, and as long we continue to put economics above ethics, we can hardly call ourselves a civilized country.
3. The draft economic analysis estimates, depending on the date of prohibition, pigmeat price increases of about 4.4% to 4.7% and decreases in the availability of pigmeat of about 3.1% to 6.7%. The total cost for the pigmeat market is estimated at up to \$3.9 million per annum, or \$266 per sow per annum. What is your view on the size of these impacts?  
These impacts are moderate. Higher welfare standards are more important than cheap meat. This is the very reason our government needs to ban sow stalls and gestation crates for good: consumers are speaking out against factory farming, and it's time our government listened.

- Sub 94 It is quite reasonable that farmers should bear the cost of converting their farms to provide better housing conditions for pigs. These farmers have been exploiting pigs for decades. This is not a new debate. I helped gather signatures on a petition hoping to outlaw sow crates some 10 or 11 years ago. Farmers (if they were not so self-interested) could have begun improving their pigs' housing conditions many years ago.
- My comments on the size of the economic impact is "so be it". If the consumer has to pay a little more for meat produced humanely, I am sure we will all survive. I myself have only bought Freedom Farms' bacon since the TV expose back in May 2009. I have not bought any other pork products. I wonder how many other New Zealanders have become abstainers. This is often the way with the general public. "We vote with our feet". With regard to any imported pig products, these should only be imported from countries whose pig welfare standards meet strict criteria, even if this is a more expensive option. Prices of imports would therefore be more in line with our own projected higher prices.
- Sub 123 The Draft is very thorough, logical and easy to follow. All major factors appeared to have been considered and the assumptions for the economic models are realistic and reasonable. The models indicate a moderate economic impact by changes to welfare standards (while changes to welfare standards lead to significant improvement of welfare). The economic analysis estimates indicate that predictions and statements made by the Pork Industry Board, currently and in the past, are not based on facts or economic analysis.
- Sub 133 The argument that more pig meat will be imported from countries with worse welfare standards if the price goes up can be countered if regulations are put in place that prevent this.
- Sub 134 I feel the Economic analysis has been largely exaggerated. I believe it is the Government's responsibility to guide the NZ Pork Industry to better welfare management and reduce financial impact on New Zealand's pig farms. I also see the Analysis including the negative impact of a change to the code in the form of inflation. It is unfair to suggest that increases in pig meat prices will solely fall on a ban of crate use. Wages, maintenance, feed, all these things continue to increase in the market and are ultimately passed on to the consumer whether or not there are changes in housing systems. I totally disagree with the analysis with the assumption that New Zealanders will buy more imported pig meat if there is an increase in price or decrease in availability. 100% Fresh NZ Pork is a good brand and it sells. The majority of consumers buy cheap pig products believing it is NZ Pork. I feel it's the Government's responsibility to promote NZ produced meat by means of healthy eating choices, and clear labelling of NZ pork products, educating the public of the facts surrounding imported pig meat. There is no doubt some existing farms will suffer initially from a complete ban, but I believe the analysis has not taken into consideration changes the NZ Government can make to assist in converting stall farms into group housing systems. NZ Customs are able to adjust tariffs on importing pig meat not adhering to NZ welfare standards. MAF are able to change requirements of an import permit for importers of pig meat and by relaxing the Import Health Standard (IHS), MAF is fuelling the concerns of "exporting welfare". It is incorrect to suggest the NZ Government does not have any control over how and what pig meat enters New Zealand. Another reason why I see the Analysis as an exaggeration is the statistics referring to the number of stall farms which have decreased, but with no decrease in farms in operation. Thus proving the non-stall farms are comparatively profitable to stall farms. Figures from France, Holland and the UK show that even in the better housing systems, ones with reasonable space and generous amounts of straw, a kilogram of pig meat costs less than .03 euro more (2 UK pence) to produce than in sow stalls (CIWF 2009).

- Sub 144 In the review document, we note a tendency to scare mongering with regards to the potential negative economic fallout should humane practices be imposed. Scenarios depicting unaffordable New Zealand pork being replaced by imported pork from countries with lower welfare standards are described. We point out however that New Zealanders are prepared to pay over \$20 per kilo for our fresh fish. Our market has not been flooded with imported fish. We are furthermore convinced of the potential of niche markets which cater to a growing discerning customer at home and abroad who will pay for pork from “free-range” farms.
- Sub 146 I agree with this preferred option to phase out dry sow stall use altogether, however 2017 is an unacceptable time to wait. According to the draft economic analysis the impact on the industry (in terms of industry exits, decreased production, higher consumer prices) is slightly less when using a 2017 phase-out as opposed to a 2013 phase-out. However, in my opinion, the impact of the 2013 phase-out is perfectly acceptable, and in fact the estimated percentages of decrease of the number of farms and production volumes are negligible. One of the Key Model Assumptions driving the 2013 results are that producers will lose many consumers when passing on cost increases. Personally I do not believe that will occur because pork will remain a competitively priced protein in comparison to other options, such as chicken, beef, lamb and fish. An increase of pork prices by 4.4 to 4.7% is passable and can occur even without the industry changing its farming methods. But in any case, retail prices should be expected to reflect the cost of farming, just the same as beef and lamb meat is expected to reflect the cost of farming and does so. It is up to the market to meet the cost of correct welfare, not the other way around, where the animal welfare is compromised in order to meet market demand. I for one, will be more than happy to pay a further 4.4 - 4.7% to ensure the pork I purchase is well raised and protected by an adequate code of welfare. Even if a reduction of consumer demand does occur as a result of higher prices, this should fit approximately with the decrease in production and effectively cancel out much of the impact. A natural fit should evolve. On the other hand, the number of sows in stalls from 2013 would be zero, which is the ideal outcome. After all, the Code of Welfare for Pigs should have the pig's actual welfare as the number one priority, over and above concerns for the consumers and the farmers. Therefore the 2013 phase-out date is the best of the suggested options, please change the recommendation.
- Sub 159 Likewise, MAF, instead of upholding the legislation (Animal Welfare Act) has provided a draft economic analysis document that appears to support the industry to maintaining pigs in conditions that are contrary to the Act. Economics are not a reason to hold any animal in appalling conditions. It seems to me that it is not NAWAC's job to be concerned about the impacts on the industry, only concerned about the welfare of the pigs.
- Sub 166 A ban on the use of sow stalls from four weeks after mating will have a dramatic effect on our business. Our piggery buildings are on average over 30 years old. The location and layout of the complex does not easily allow development of new facilities on site. The obtainment of building and resource consent, if successful, would be time consuming and expensive. The only realistic, but less than ideal option, would be to remodel existing facilities further into group housing. This would mean a reduction in total sow numbers by about 20% with a consequent drop in production of 120 T of pigment annually. Sow feed costs would increase by 6% and staffing would be reduced by one fulltime employee. The estimated cost of the redevelopment would be \$80,000. Overall, piggery performance would be expected to fall with a negative result all round. We believe that a ban on sow stalls will have no effect on the local price of pork. The Pork Industry has always been price-takers, not price-makers. Research shows that consumers are reluctant to pay more for pigs raised without the use of stalls. History shows that decreased local production will simply be replaced with imports from countries with

probably lower, or unknown, welfare status. We note that most other countries that New Zealand imports pig meat from ie Canada, USA, have far lower welfare standards than currently proposed here. It is blatantly unfair to impose more stringent requirements on local producers without requiring the same from imported product. Both the consumer and local pig producers are being disadvantaged by this policy.

- Sub 172 'we would particularly welcome any comments you may have on MAF's draft economic analysis' This invitation displays a substantial industry bias in the consultation process. Sure, anyone can make a submission, but who has the greatest economic interest in this process - the producers, who bury the consultation process in endless legal representations and 'expert' opinion to maintain the status quo. This 'welcome' statement is almost an invitation for producers to challenge the economic analysis that MAF has undertaken, and thus challenge the basis for the draft code.
- Sub 173 The draft Economic Analysis provided as part of the draft Code of Welfare predicts that some stall farmers are likely to exit the industry. It also predicts price rises of between 4.4 and 4.7 per cent. The model also predicts that non-stall farmers will benefit. The authors of the report admit that their predictions are conservative and therefore represent a worst-case scenario. A few stall farmers going out of business and a slight increase in pig meat is hardly an economic disaster that justifies applying "exceptional circumstances". In addition, even the worst-case scenario is better than presented because it only concerns the supply and demand side of the pig meat industry and not the economy as a whole. There are likely to be additional positive economic spin-offs from a ban of sow stalls, not analysed by the report, including:
- Increased employment of pig farmers, due to the higher labour demands of non-stall farming. Increasing job opportunities in the present economic climate of high unemployment will have the flow-on benefits of reducing crime, health costs and welfare dependency.
  - Improving general education levels as pig farmers have to retrain to understand the more complex demands of non-stall farming. The requirements for education of stockpersons are actually provided for in Minimum Standard No. 1 and associated discussion of this standard in the draft Code of Welfare.
  - Improvements to our "clean green image" and therefore to exports and tourism.
  - Environmental improvements that would result as the extremely environmentally damaging sow stalls are removed. Intensive sow stalls in New Zealand have been responsible for high levels of water pollution. Alternative indoor housing systems and free range units are less environmentally destructive. An improvement in our environment will have flow-on benefits to tourism revenue.
  - Adverse publicity around pig farming is hurting stall producers, but also all other producers who are not able to differentiate their product as coming from less aversive production techniques. A ban on sow stalls would improve the image of the industry.
- Farrowing crates: While no economic analysis is available for New Zealand, overseas analysis suggest that effects would be minor and would certainly not justify claiming "exceptional circumstances" under Section 73 of the AWA. There would also be positive economic benefits for the country as a whole, as discussed above in the consideration of the effects of sow stalls. The fact that approximately one third of New Zealand pig farms do not use farrowing crates at all, yet do not receive any subsidy or price premium, certainly suggests that a ban on farrowing crates would not produce any significant hardship.
- Sub 174 1. I do not agree. NAWAC and the Minister must follow current knowledge about ethically robust farming practices.



2. Assumptions in the draft economic analysis are based on the imperative to mistreat animals to provide meat, and that the pigmeat industry must be protected. Please start with the assumptions that animals must be treated respectfully, and meat must be produced ethically in New Zealand.

3. I strongly encourage this direction to downsize the pigmeat industry. Along with this should run an education campaign about responsibilities that come with caring for animals, and the health benefits of a vegetarian or meat-reduced diet.

- Sub 198 In my view the increased costs to the pig farming industry from improving pig welfare are justified, because the current level of costs is artificially low, being based on treating pigs in ways that fail to meet their basic welfare requirements.
- Sub 200 The analysis is restricted to assessing the impacts of options for dry sow stalls, in economic terms only. While this is obviously the job of the document, I think the economic considerations should have less weight when designing a code of welfare. A code of welfare should be primarily concerned with the welfare of the animal, not the economic impacts.  
My view is that these impacts are minor. Many people are happy to pay significantly more for ethically farmed meat, as can be seen by the growing demand for free-range.
- Sub 201 I agree this has taken into account necessary factors but as above, the farmers have had years to change and haven't so 2012 to replace dry sow stalls is way too generous. Importing pork when we can grow our own is detrimental to the industry and to consumers given the hideous conditions pigs are kept in in places like Russia. I don't care about the impact on the industry as reform has to happen. If NZ pig farming were a scientific experiment it would fail the ethics requirements. Far better to have a clear signal to the industry now than mollycoddle them for years while they 'adjust'.
- Sub 204 These impacts would appear to be within a range which is manageable and absorbable. Certainly there is nothing in these estimates that would cause many people to think, "the financial cost of ending a significant cause of sustained animal cruelty is too high". A price increase of the magnitude estimated is in the same range as inflationary increases over a relatively short period. Based on these estimates, it would seem that the sow stall phase-out can proceed immediately without fear of having to ask the country to pay a high cost.
- Sub 211 The Draft Economic Analysis (March 2010) has taken a very naïve view on the ability of the NZ pig industry to manipulate pigmeat schedule prices to offset negative financial consequences from a change in the Code. It is claimed in the report that the NZ pig industry "will have some ability to pass on additional costs to the consumer." (Key Assumptions in the Model – page 2 of the Draft). This is totally uninformed as the industry has no way of managing imports and indeed at this very moment there are new packaging techniques that would allow Australia to export fresh pork to NZ in any volume it so desires assuming it has a surplus to export. Considering fresh pork is the mainstay of the local industry there is absolutely no way that the NZ industry can demand a premium over the price of imports except in times of short supply. Fortunately in recent years Australia has experienced a pork shortage purely because their industry like ours contracted due to extreme feed prices. Their industry is now rapidly rebuilding on the back of very cheap feed prices. This therefore means the NZ industry will soon be subjected to even tougher competition from Australian supply. The UK Industry serves as an

excellent example where countries exporting to the UK were not required to reinvest in their industry as was the UK, for nothing in return.

The analysis continues with the theme that stalls must go despite any evidence to the contrary. In "Key assumptions of the ban options" it is stated "The final 27 percent will have incurred debts moving to four weeks, but will have some ability to pass on additional costs to the consumer". In "Banning dry sow stall use in either 2013, 2017, or 2023" "The model estimates that banning sow stalls will cause: pigmeat price increases of between about 4.4% and 4.7%".

The assumption that NZ farmers can influence schedules is totally incorrect. The following is a quote by Steve Glass (pers. comm. Apr 2010); one of NZ's most experienced marketers of pigmeat. Steve Glass is Managing Director for the FreshPork group of companies which process and market approximately 30% of New Zealand's kill;

"I am quite astonished to hear that there may be any implication that farmers can influence schedules. One might be forgiven for arriving at such an uneducated conclusion given that three of the four major wholesalers are owned in part or in whole by entities that also have interests in pig farming. However, I would expect an economic observation to understand that the wholesale markets for pork in NZ are quite influenced by the hands of very few with only two supermarket chain owners, and with the bacon & ham manufacturers now very dominated by only three companies. With pork consumption in NZ being met by almost half imports (45%), the international supply/demand balance for pork is of course the major influence, as is the strength of the Kiwi \$ against the major import source country's currencies; Australia, Canada & Finland (and to a lesser extent Denmark and the US)."

Therefore with no ability of NZ farmers to manipulate schedules they are totally exposed to the import price of export companies. Given the relatively close proximity of Australia and new technologies that allow fresh pork to be shipped to NZ out of their surplus production, NZ is more exposed to imports than ever before. If money has to be brought into an animal welfare debate, a view often used against our industry as the motive for using stalls, then certainly forcing financial expenditure on our industry will render us less capable of out-competing countries which don't need to change.

- Sub 251 Financial constraints combined with import substitution and competition from subsidised economies have continued to apply over the past 30 years, which have continued to make it difficult for pork producers in New Zealand to make adequate returns. Canterbury, in particular, has had ongoing issues with shortage of qualified labour and low meat schedules which has made it even more difficult to survive. The profit margin from pork production has continued to shrink and approximately 50% of the years that Houtimata Farm Limited has been in business, negative returns have been generated from the farming operation. As a result at these factors, the ability to continue to re-invest in new facilities has been severely restricted. However, there is now an acceptance that in order to remain in pig farming, it is necessary for re-investment to occur and the proposed changes to the Pig Welfare Code will force the industry to address a number of the economic issues which will follow from this. If the Industry is unable to improve profitability and farm performance, then ultimately there will be no pig farming in New Zealand and New Zealand's pork requirements will all be sourced from imported product. We agree that for the improvements proposed for animal welfare to be viable, support will be needed from not only the various Regulatory Authorities and farmers, but also the processors who currently choose to import cheaper product from subsidised countries not subject to any Animal Welfare Codes, which continue to reduce the profitability of pig farming in New Zealand thereby reducing the ability of the New Zealand farmer to generate sufficient income to provide for improved on-farm facilities.

- Sub 258 If Farrowing crates and stalls were to be banned in the near future we would be forced to close as the cost of buildings and the loss of production in the present pig farming economic circumstances (caused by pig meat imports – much of which is produced in countries with inferior welfare standards to our current code) would be prohibitive. For our farm it will be very difficult if the date of achieving phase down in the use of stalls to 4 weeks post-mating is brought forward, at this very late stage, from 2015 to an earlier date. We have already had considerable expense building a new mating shed to comply with the present Welfare Code to do away with Boar Stalls, and have been reviewing our farming situation based on the 2015 date. We believe that our experience of development and change provides a very clear illustration that as farmers we have been prepared to innovate and trial new systems appropriate to our farming situation as they became available.
- We are very concerned that the perception of welfare as indicated by these proposed changes does not in fact equate with welfare from the pigs' perspective, as our experience shows. Attempting to require higher welfare standards will not earn us any extra as our schedules are dictated by Imports and Supermarkets. This is demonstrated by the fact that the local New Zealand pig kill is the lowest it has been for years for years yet in the last few weeks we have had schedule reductions totaling 40 cents per kg – which is approximately 10%. At the same time imports have reached around 45% of total pigmeat consumption in New Zealand, and the very great majority of this product comes from countries utilizing practices far more intensive than New Zealand.
- Great Britain – which is one of the few countries in the world to ban stalls – has seen their sow numbers reduce from approximately 460,000 to 345,000 and their imports have increased proportionately with pig meat from countries with much lower standards.
- Sub 260 Again the move to no stalls would require capital investment with no improved on farm performance, therefore undermining the long term viability of the farm. Given the economic times of farming and the future uncertainty of other external pressures placed on pork producers the cost of making on farm changes would make us look closely at the viability of the venture. The frustration is that for every pig not grown in NZ, a replacement pork product is sourced from overseas without any thoughts about the welfare of that animal.
- Sub 261 However I cannot consider expansion at the moment. I am very concerned about the impact of a potential stall ban, both in welfare cost to my sows, and in productivity. I am also concerned about my ability to fund and obtain a resource consent – yet another uncertain cost to my farming business.
- Sub 262 As your economic analysis shows there has been an increase of fresh pork consumption as per the NZ Pork information (assumed from their marketing campaign for Fresh Pork). This could equally be assessed as the processors favouring the use of imported product at a lower price. This has pushed the locally produced product into the fresh market giving the impression of increased demand. What has failed to be demonstrated is that an increased value for the domestic production is able to be achieved over the imported price. It needs to be remembered that 100% of the local production will be consumed each year as there is very little to no export opportunity. NZ's farm gate price
- The analysis also states that very little fresh is imported but it does show that it has increased from 0% in 2000 to a peak of 2.07% of imports in 2007. This could be concluded that if NZ domestic price becomes too high relative to the Australian price the mechanism is there and will be used by retailers to control NZ's farm price. If domestic production falls as you imply it will with the loss of stalls the increase cost of handling (killing costs, production product supply's and industry levies per pig) of a lower kill will increase therefore reducing profitability to the farmer. The need to gain an increase in price to the consumer is greater than stated. Given the static domestic production over a large number of years and recently a significant decline it would be reasonable to assume that any

legislation driven increase in cost against our major trading partners will reduce investment further. As your report notes (pg 28) the decline in Sth Island production was over 400% higher than the Nth Island showing how sensitive the less intensive industry is to lower returns.

Sub 272 The Draft Economic Analysis (DEA) that supposedly supports the complete ban on sow stalls by 2017 is a poor analysis that has many flaws, incorrect assumptions, misinformation, misunderstandings and biases. Quite frankly it should never have gone out for public consultation. It highlights a lack of understanding of the NZ pork market, NZ pig farming and the economics that pertain to that industry. The following highlights our comments:

We disagree with the number of sows in stalls quoted. With our knowledge of the NZ commercial pig sector as a Breeding Company we believe the following statistics apply: Total commercial sows (indoors and outdoors) 35,000

Indoor sows 21,700

Sows using stalls (87% as per farmer survey) 18,900

This is 13 % higher than the DEA figure of 16,750 sows.

The assumption that the pork industry can pass the increase in cost of production on to consumers is seriously mistaken and shows a lack of understanding of the dynamics of the NZ fresh pork and processed markets.

The fresh pork and processed sectors are strongly interconnected. That is, if prices increase to the processed sector then they move to imported meat and more pigs end up in the fresh meat trade. This results in an increase in supply which creates downward pressure on pig prices.

If the NZ market is short supplied for a period of time, the shortfall is taken up by imports.

If stalls are banned, the NZ pig supply will reduce as producers find it uneconomic to farm pigs. This will just result in more imported pig meat from sow stall system overseas – essentially exporting the perceived welfare issue.

Pig farmers in NZ are price takers, not price makers. If imported prices move the NZ domestic market is strongly correlated to that price movement, albeit with some time lag.

The assertion that when grain prices rose in 2008 pig meat prices rose to compensate is incorrect. Pig meat prices rose because the global meat price rose. To say that pig farmers can simply pass the increased costs associated with removing stalls on to consumers is fundamentally flawed.

Imports of chilled pork into the NZ fresh meat sector will increase in the future due to the possible relaxation of Import Health Standards for Pig Meat into NZ and improvements in packaging technology that extend the shelf life for chilled pork. This will reinforce the importance of being globally competitive in pig production in New Zealand. As such there needs to be a “level playing field” in terms of animal welfare compliance for the sources of pork that come into the NZ market.

From our experience, the financial assumption that it will cost \$2,000 for a Resource Consent is seriously underestimated.

We disagree with the argument that by banning stalls it will lead more indoor producers to go outdoors. As a Breeding Company we need to maintain a high health status which cannot be achieved by farming outdoors. Further, outdoor pig farming is only possible in areas that have the right climate and soil type, such as Canterbury. We have 2 farms in the North Island where the land is not suitable for outdoor sow production.

If it becomes uneconomic for us to continue to operate on any of our 5 farms because of the changes required or the inability to get funding, then we may be forced to close some of these farms. This would mean the NZ Industry would lose access to PIC breeding stock and genetic improvement that allows farmers to remain productive and competitive.

Sub 273 The draft economic analysis appears to be well constructed, but is based on some questionable assumptions. I deal with these below. I disagree with several of the base assumptions on which this analysis is based. These are:

(a) *There are alternative housing systems available to farms.* Many farms do not have the ability to change to group housing due to restrictions of resource consents. Councils will not automatically allow the building of new sheds and most applications require hearings. The constraints applied to expansion of existing pig sheds are often prohibitive.

(b) *The pork industry has some ability to pass on cost increases to consumers.* This statement is not correct. Pig farmers supply a domestic market in which we are price takers. We have no means of passing on costs to the consumer. The benchmark price for pig meat is set by the landed price of imported pig meat. Most of this imported frozen meat is used by the processing industry. It currently represents 48% of all pork consumed in New Zealand. For much of the year we sell our pig meat for a small premium over the benchmark price of imported meat. This local premium is paid by the processors for the benefits of Lower drip loss of fresh compared to frozen.

Fresh meat tends to absorb the brine better.

The texture of bacon made from fresh meat is better than that made from frozen.

The preference of some consumers for NZ product. Bacon and ham from local meat can be retailed at a higher price than that made from imported pork.

A seasonal premium that is achieved by changes in demand for local product. These demand premiums rise through winter (bacon and winter roasts) and peak in December with the festive season. The seasonal premium declines to nil over the February to Easter period. The benchmark price for bacon pigs is set by the averaged price of imported product over a long period. Processors forward buy their supplies three months ahead of when needed to allow for shipping. Most will have forward contracts either to buy or to hedge against foreign currency movements. This has a smoothing effect on the benchmark price. This benchmark price of imports is what sets the price in our local pig market. If the supply of pigs locally is tight and the price starts to rise, the processor simply uses more from the store of frozen product that he has on hand and makes less bacon from local meat. If the local price falls to the price of his imported meat, the processor will quite happily use more local product.

The price that is paid for processing pigs on the local market is the benchmark plus the local premium that prevails at the time.

The price that is paid to farmers for pigs sold as fresh pork is tied to the price of pigs sold for processing. Our bacon sized pigs that are sold into the fresh market are worth exactly the same as if they are sold into the bacon market. Smaller pigs that are sold into the traditional fresh pork market are paid at the bacon price plus an increment necessary to convince the pig farmer to sell his pig at a weight that is less than optimum.

So our ability to pass on extra costs to our consumers is nil.

If we had some means of controlling the price of our pork we could simply raise our selling price. However we would be no better off as the average consumer would refuse to pay the extra premium for bacon made from local pigs. The processor would make a greater proportion of his ham and bacon from imported pigs, leaving more fresh pork in the local market. This would flood the local market. We

would be forced to hold pigs back on farm. Pigs would go overweight, sheds would be overcrowded and farmers would be forced to sell pigs at huge discounts, store frozen pigs or shut up shop and get out.

(c) *Key Point: Fresh pork demand may be less elastic than processed meat demand.* This statement shows the underlying flaw in the model. The use of different elasticity for the fresh and process markets cannot be justified. Movement of pig carcasses between process and fresh market occurs daily. A pork producer supplying a wholesaler has no control on the final destination of his pigs. One day they may be for bacon and the next day they go to the fresh trade. If NZ pork production was to decline to the point that we sold all of our product into the fresh trade and none to the processed trade then you would have an argument for different elasticity assumptions between the fresh and process sectors. But with free movement of fresh pork across the Tasman, it is likely that Australia would enter our fresh market before we were able to benefit from the extra returns that the lack of local supply might generate.

d) *Key Point: The pork industry has some ability to pass on cost increases to consumers.* Sure the price went up. It went up overseas as supply demand played out in international markets and eventually flowed through to the base price of imported pork and on to our market. We had no part in the passing on of costs of grain to the consumer. We had to wait until it happened overseas.

This is nonsense to suggest price increases of 4 to 5%. There will be no price increase due to reduced availability of pig meat. All that will happen is that our market share will be reduced further and the proportion of imported pig meat will increase to fill the void. In my 30 years farming pigs I have observed the decline in pig farms in the North Island with no matching increase in price. We just import more from overseas countries where pig welfare is not a high priority.

Sub 274 The economic analysis indicates that costs of the additional animal welfare measures will ultimately be borne by consumers paying higher prices for products. It also concludes that consumption will drop and that some farms will be forced out of business (p.2 Economic Analysis).

Currently New Zealand pork production accounts for 0.1% of global pork production (that's rounded up) and about 45% of pork consumed in New Zealand is imported. Federated Farmers submits that it is injudicious to state that additional production costs will be borne by consumers prepared to pay higher prices, especially during recessionary periods such as we are currently experiencing. The reality of the market place is that retail prices do not necessarily reflect a farmers production costs. Research by NZIER<sup>1</sup> has shown that farmers have been unsuccessful at passing on their costs to the consumer and that the power is held by others in the value chain with farmers generally being the price taker.

Consumer market surveys, such as that completed recently by NZPork, highlight that there is very limited demand for alternative 'free-range' options due to the higher price at the supermarket. As recessionary constraints take place consumers have become price driven when making purchasing choices. It is also know that the price of imports sets the price for New Zealand based production. Rather than solve the problem the proposed Pig Code will lead to an increase in local productions costs thus making it easier for imported products to increase market share, and so the perceived animal welfare problems will be transferred to competitor countries.

Federated Farmers submits that supporting a New Zealand pork industry is a smart decision for the economy. For example, for every \$1.00 of pork purchased from a New Zealand farmer another \$1.92 is contributed to the wider economy while a dollar spent on imported pork only contributes an additional 0.78 cents. (i.e. a 0.76cents difference). Therefore a 5 percent drop in volume from the New Zealand pork industry (e.g. 2500 tonnes) on a historical bases @ 3.50kg would equal \$8,750,000 which leads to a total \$25,550,000 contribution to the economy. Spending the same amount on imported pork only generates \$15,575,000 to the economy.

In addition, any reduction in the New Zealand pig industry would significantly impact on grain producers who supply product to local pig farmers. Grain growers are currently finding it difficult to secure viable prices for their product, partly due to competition from imported grain. Currently the pork industry uses around 180,000 tonnes of grain annually and the vast majority of this comes from local grain growers. At \$350 per tonne this is approximately \$63,000,000 worth of income and a critical market for New Zealand grain growers. Given this scenario it is important that the pig industry in New Zealand continues to grow so that grain growers can also secure future markets for their product. The two industries are intertwined and any negative impact on pork producers is a negative impact on our grain growers.

New Zealanders have stated that their preference is to have locally produced product available to purchase. The proposed move by NAWAC is regarded as a multiple lose scenario. Consumers will have less NZ product available, we will have less pig farmers, New Zealand grain growers will miss out on valuable income and the whole economy will be worse off

In summary, Federated Farmers has reservations with the draft economic analysis. We question the good sense of putting out a 100 page plus complex analysis for public consultation around a contentious emotive issue such as sow stalls. It is potentially a concerning precedent for other similar agricultural issues.

Sub 275 The draft economic analysis conducted by MAFBNZ as a basis to set a date for a ban on the use of stalls appears to misunderstand this very important fact: indoor farms in many areas of New Zealand simply cannot be replaced with outdoor farming systems. Among many constraints, animal welfare would severely suffer. There is simply a void in the quality and quantity of skill set required to successfully convert to fully group housed systems for sows.

I also fully support the independent economic analysis that has been done by NZPork, at considerable cost. The reality is that if these costly changes which will not enhance welfare are forced on the industry under urgency (both the stall ban and the additional space requirements) then the New Zealand pig farming industry will contract. Imports will take their place.

I also wish to record my bitter disappointment at the process followed by MAFBNZ in preparing its draft economic analysis. MAF did not provide NZPork with the opportunity to review the analysis, including the application of our own data, despite the specific agreement that this would be the case when NZPork was asked to assist. Additionally I was bitterly disappointed at MAF /NAWAC's preparedness to release this draft for public consultation, despite NZPork's pre-consultation input (based on expert independent review) that the analysis was fundamentally flawed.

Sub 276 Without sow stalls? Give us \$4.50 a kg for our product on a continuing basis and we'll build. At the current on farm net banked per kg of \$3.40, an absolute insult even to us most hardened types, forget it.

Sub 297 We would like to make the following comments on what we see as the key assumptions in the draft economic analysis:

The analysis seems very lengthy and complicated, which in itself suggests that the authors have had to work hard to justify the results and that the results and the assumptions are subject to opinion.

The analysis assumes that the industry will maintain a 4 to 8 % price premium for non-stalled production if all sow stalls were banned.

We would contend that if all sow stalls were banned any premium would disappear as the premium market would soon reach saturation and then competition would erode the premium completely.

The analysis considers the market price to be set by the producers and uses as justification the rise in price in 2008-2009 when the pig producers feed costs were increased. The main influences on pig returns are the international pork market and indirectly the worldwide feed market. To consider that the New Zealand pork producer will be able to raise its farm-gate return just because our internal costs have increased is totally misguided. The market is basically governed by international forces and the domestic supply and costs now have very little influence on the farm-gate returns.

The costs of capital (interest and depreciation) used in the model are also questionable. Our dry-sow stalls are 20 years old and we have just done some minor repair work on them and expect them to be good for another 20 years therefore an economic life of 7 years as used in the model is very short.

Whilst we do not have the data to dispute the figures we consider the number of sows currently housed in stalls used in the analysis to be very low, and maybe the interpretation of the NZPIB survey data needs re-examining.

In our circumstances the only way we could see to decrease the impact of the cost increases imposed on us by the need to reduce the use of dry-sow stalls was to expand our production to achieve some gains from economies of scale. Thus it is difficult to reconcile our personal experience with conclusions that the banning of the sow stall will have little or no impact on the New Zealand Pork Industry.

Sub 298 I do not have time to comment on the draft economic analysis but challenge the notion (if I read it correctly) that any reduction in pig meat production in NZ won't be countered by a commensurate increase in importation of pig meat from overseas, to the detriment of New Zealanders and the standards we adhere to.

Sub 299 NZPork has deep concerns about the validity of MAF's draft economic analysis as a basis for decision making regarding the financial and economic impacts of banning sow gestation stalls. As already noted, NZPork fundamentally disagrees that such a ban would be in the best interests of pig welfare, given current knowledge and available technology, and is not the minimum necessary to meet the purposes of the Act. However, it appears that NAWAC's justification for proposing a ban on gestation stalls is its mistaken belief, on the basis of the MAF analysis, that such a ban: a) Is affordable by farmers and the industry (because the cost of it would largely be paid for by consumers through a price rise on pork); and b) Would not result in increased imports of pork from countries continuing to use stalls (the so-called 'export of the welfare problem'.

The MAF analysis is fundamentally flawed, in that: a) It misunderstands the nature and dynamics of the New Zealand pork market; b) Many of the assumptions used are wrong; and c) The methodology used is overly simplistic in its application.

NZPork has commissioned an independent analysis of the costs and economic impacts of NAWAC's proposals. This analysis has been carried out by Wellington-based agribusiness economists Nimmo-Bell and Company Ltd and a copy of the report will be provided as commercial-in-confidence to NAWAC. In summary, the Nimmo-Bell analysis shows: a) There will be a massive impact on the industry of a stall ban particularly if a reduction of use to 4 weeks in 2012 was to be followed by a ban in 2017, and only slightly less in 2023; b) Farmers would need to absorb the costs of change – it would not be able to be passed on to consumers; c) This would see a large contraction in the numbers of farms, as especially the smaller farming operations currently using stalls could not afford to make the changes, with consequent serious financial losses incurred by the farm owners who are forced to exit (as their will be a massive cash loss incurred on their assets at that point), and a reduction in pigs; d) Pig supply would be reduced by an estimated 14% and this would be substituted by imported pork from countries that do not meet New Zealand's animal welfare standards; e) A ban in 2017 would incur value destruction in the New Zealand industry at farm level equating to \$27-28 million dollars annually. This would generate an



additional annual net loss of value to the New Zealand economy, given the economic contribution of \$1.92 per each \$1 of farmgate sales compared to \$0.78 per each \$1 of imported pigmeat (NZIER, 2007), when New Zealand production is replaced in the market by imports; f) A ban in 2023 would incur value destruction in the New Zealand industry at farm level equating to \$23 million dollars annually, and an additional annual net loss of value to the New Zealand economy, due to import substitution, when New Zealand production is replaced in the market. In NZPork's view these financial and economic impacts will have a serious and unjustified negative impact on the livelihoods of New Zealand pig farmers and those that support them such as grain producers, freight operators and the service industries, if implemented. It will also be against the wishes of the New Zealand consumer whose preference is for New Zealand pork, and a net loss contribution to the New Zealand economy whereby all New Zealanders lose.