

Type of submission	No of submissions received	Submission	NAWAC Response
<b>SAFE standard letter</b>	368 (+ 3 late submissions)	<p>I am writing to make a submission on the draft code of welfare for animals used in rodeo. Like SAFE, I believe that rodeos are cruel to animals, subjecting them to unnecessary torment and stress for the sake of entertainment.</p> <p>SAFE and the SPCA, New Zealand's two largest animal welfare agencies, plus many other organisations worldwide, oppose the use of animals in rodeos on animal welfare grounds.</p> <p>Rodeos are in breach of New Zealand's Animal Welfare Act which states that animals should be physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress (section 4). By their very nature rodeos deliberately subject animals to fear, stress and torment.</p> <p>The only acceptable option for rodeos is a complete ban.</p>	Noted
<b>Canterbury Rodeo Supporters Standard Letter</b>	8	<p>With the code of welfare 201X for Rodeos due for review and as a long time spectator and supporter of rodeo, I would like to make a submission in support of the current CoW for the following reasons:</p> <p>The rodeo organisers that I have observed have an excellent attitude to the welfare and well-being of the rodeo animals. Because of the value of the animals that are used for rodeo, it is not in the interests of the stock contractor and handlers to have these animals mistreated or abused.</p> <p>The animals are well cared for all year both physically and mentally. When the rodeo season starts each year, the animals are in top physical condition allowing them to take part in rodeo events.</p> <p>The work load of the animals and conditions imposed by the present code and the adherence to this code by the rodeo organisers, in my opinion, is certainly in favour of the humane treatment and well-being of the animals.</p>	Noted

		<p>Comments I read in news articles are made by people with good intentions, but are usually emotive, uninformed and made without empirical knowledge of the care and attention that rodeo animals actually receive.</p> <p>The unfortunate situations that do occur are, again in my opinion, no worse and in lots of cases, far less than other animal orientated sports.</p> <p>If a complete ban was to be imposed on rodeos then in fairness a complete ban should be imposed on all other animal orientated sports.</p>	
<b>Section of Code</b>	<b>Submission No.</b>	<b>Submission</b>	<b>NAWAC Response</b>
<b>General Comments on text</b>	19	The term “horse-riding event” is to be substituted for “rodeo” in the title and throughout the document. In all cases, example indicators are to be minimum standards, except where they refer to banned equipment (like spurs, goads or flank straps)	Disagree
<b>Section 2 – Responsibilities and Stockmanship</b>			
	29	<b>Responsibilities (2.1).</b> The NZVA recommends that the requirement that animal welfare officers should have their responsibilities specified in writing should be a minimum standard (MS). We would also recommend that such responsibilities should be reviewed by the attending veterinarian, and should form part of the welfare assurance system. In addition, we would recommend that, so as to safeguard animal welfare, animal welfare officers <b>must</b> be accredited, for example through the completion of an educational course detailing rodeo events, rules, animal health and welfare, how to spot situations which are potentially dangerous for either animals or competitors, and of course the responsibilities and expectations of animal welfare officers officiating at rodeos.	Disagree. But wording changed

	29	We suggest an additional recommended best practice (RBP) that the animal welfare officer should be experienced in handling all species of animals used in the rodeo.	Disagree – but added in MS.
	23	<p>It is the belief of the SPCA that persons or organisations who purposefully place animals in situations where their welfare is likely to be compromised in direct contravention of the Act should be compelled to provide the highest standard of monitoring and veterinary care possible. This we suggest is the least that is to be expected, especially when the welfare compromises are being made for profit.</p> <p>We strongly believe that a veterinarian must be present at all rodeo events for the duration of the event and that this veterinarian should be mandated to complete and maintain a record of injuries and deaths for future auditing purposes.</p> <p>For this reason <b>we submit that</b> recommended best practice indicators (a), (b) and (c) be made minimum standards within Minimum Standard No.1 – Stockmanship.</p> <p>Due to the inherently deleterious nature of events such as rodeos the SPCA believe it should be expected that the duty of care toward the animals involved is such that their wellbeing is monitored before and after each event by a veterinarian.</p> <p><b>We therefore submit</b> that Minimum Standard No. 1 – Stockmanship, have the following clause added: <i>“A veterinarian must inspect all animals prior to and on completion of each event for signs of ill health or injury”.</i></p> <p>The SPCA would also urge the ministry to make it a requirement that a training and certification scheme for “animal welfare officers” is developed and implemented. As it currently stands there is no requirement for these officers to have any level of training or expertise whatsoever, thereby virtually nullifying their purpose. We are aware that at some events the animal welfare officer is chosen by the organiser because he or she is a good stock handler or is known to the operator.</p> <p>We firmly believe that an animal welfare officer has responsibility to ensure that all animals used at</p>	<p>Noted</p> <p>Agree</p> <p>Agree with (c) only</p> <p>Disagree; impractical</p> <p>Agree, wording changed</p>

		<p>rodeo events are housed, managed and handled in the most humane manner possible. Along with the veterinarian this person is the arbiter of which animals may or may not be used and should also be responsible for ensuring gear, equipment and the events in general are compliant with the code.</p> <p>For this reason we feel that a training scheme must be mandated to ensure these officers are familiar with the Act, the code and any other specific knowledge required to ensure animal welfare standards are appropriately maintained. This scheme would ideally involve either MPI or SPCA inspectors and would result in a certification for the individual allowing them to demonstrate their level of knowledge and ability. Such a scheme would bring with it the added benefit of bringing enforcement agencies and rodeo operators closer together.</p> <p><b><i>For this reason the SPCA submit that</i></b> Minimum Standard No.1 – Stockmanship part (c) be amended to read: <i>“An animal welfare officer who has completed an approved training course and has obtained the required standard must be appointed and present at each rodeo”</i></p>	Disagree
	7	<p>Minimum Standard # 1 page 7 Stockmanship.  [c ] Provision should be made for the Veterinarian to be able to be called away to emergencies. Often in our smaller areas there will only be 1 Veterinarian available period.</p>	Disagree
<b>Section 3 – Food and Water</b>			
	29	<p><b>MS 2 – 3<sup>rd</sup> bullet point</b> – It would not be appropriate to have water provided in all pens, some of which are small working pens in which animals are only present for short periods of time. Perhaps this could be reworded to “pens in which animals spend 2 or more hours”?</p>	Agree but with different wording
	23	<p>Food and water requirements at events such at rodeos are often difficult to regulate for given the nature of the event, the stress level of the animals, and the various facilities which they are housed in. It is our strong belief however that the provision of these basic requirements is essential and therefore should be prescribed so as to make it clear to operators what they must do.</p>	Noted

		<p>Water is particularly important to animal health. We note however the risks involved with animals that have recently been ridden or used in events consuming water immediately after that event. We therefore feel that penned animals awaiting use should be provided with water whilst those exiting the arena after events may be penned without water for a reasonable cool off period afterwards.</p> <p><b><i>It is submitted therefore</i></b> that a minimum standard be added to Minimum Standard No. 2 – Food and Water, which reads: <i>“All animals in holding pens awaiting use must be provided with water, and checks made every hour to ensure water levels are sufficient and no animal is dehydrated, and animals penned after events provided with access to water as appropriate after a cool down period”</i>.</p> <p><b><i>We further submit</i></b> that recommended best practice indicator (a) <i>“Feed to which the animals are accustomed should be provided to the animals at a rodeo”</i> be added to Minimum Standard No.2 – Food and Water.</p>	<p>See MS 2b</p> <p>Disagree</p> <p>Disagree</p>
	10	<p>Food and water. This was mentioned in the submission and detail given verbally. BRNZ wished to ensure that the MS re: feed was valid in relation to the transport code.</p> <p>Explanation was given as to feeding of horses and bulls and the risk of colic if they are fed too soon prior to entering the arena to perform.</p> <p>It was also stated that young animals are fed more frequently than are the older animals, which should maybe be also stated in the code.</p>	Covered in MS 2b
<b>Section 4 – Selecting and Accepting Animals</b>			
	29	<p>While the rope and tie event continues to be of concern to many NZVA members, comments from one member with considerable experience in this field suggest ways in which the risks within this event, specifically the way the calf is brought to a forced and abrupt halt – something over which competitors should have control, could be better managed. The specific suggestion is that the wording and interpretation of the NZRCA’s rules be reviewed, and subsequently, those rules should be reliably enforced, with penalties (disqualification) arising if regulations are not complied with. To ensure reliable enforcement, the NZVA suggests an initiative for judges to be accredited after a training course</p>	Noted

		whereby they are rigorously trained on animal welfare, and correct interpretation of the rules.	
	29	We would suggest that calves that have been successfully roped must not be re-used on the same day.	Disagree
	29	<b>Selecting animals (4.1).</b> The code states that “Contract stock is to be used where possible”, but not as a MS or an RBP. The NZVA is aware that there are a number of contractors who breed and raise stock specifically for rodeo events, and that such stock is accustomed to handling, yarding, travelling, training to their event etc from an early age. This means that rodeo events are likely to be a lot less stressful for such animals than for non-contract animals. While some non-contract animals, particularly calves used for roping, are frequently hand reared calves sourced from the dairy industry and are well accustomed to handling and being within confined handling facilities, the NZVA has a concern about the impact of a rodeo event on animals that are fresh out of the paddock so to speak. We are also aware that events outside those controlled by the NZRCA and the BRA are more likely to use non-contract animals. Our concern, expressed in Question 7 above, that those controlling these events are less likely to be aware of the required standards compounds our fear that the welfare of such animals may be less than desirable. <b>The NZVA would therefore suggest an MS under MS 3 – <i>Selecting animals that all stock used in rodeos must be supplied by a contractor and must receive training to the events in which they will be used.</i></b> This requirement will also make compliance with weight ranges easier and more enforceable, as the clubs will simply employ the contractor and require that he provide compliant stock.	Disagree – but added as a MS  Disagree
	27	The CRA have several experienced organisers and stockmen – carried over to rodeo events with the selection of animals with welfare in mind.  The MS for selecting calves for riding at 200kgs is strictly adhered to with a rider maximum of 40kgs. This is not causing problems for the animal’s health and welfare. The minimum weight of 120 kgs for calves used in the ‘rope and tie’ is strictly adhered to, which means that these animals are generally yearlings or older. Therefore they have good muscle and skeletal conformation. Provided ‘recommended best practice’ is adhered to, negative effects on the animal’s health and welfare are rare.	Noted  Agree

		<p>Comments made by uninformed commentators are generally of perception and emotion rather than actual knowledge. One the calf is released, they usually trot off our of the arena with no ill effects.</p> <p>The CRA would not support a reduction of MS No 3.</p>	
	29	<p><b>MS 3k(i).</b> Member comment:  “The weight of the calf is also a question and which needs consideration. There seems to be a supposition that the use of heavier calves will provide a better animal welfare outcome. I am unaware of any scientific or medical evidence to suggest that this is the case. I am certainly open to consider this possibility should such data be provided. It seems to me that no one really knows what is better. An argument could be made that a lighter, tighter weight range could be optimum. Suppose for example, that 2 calves travel at the same time to the end of the rope – it is logical that a heavier calf will apply more force to the end of the rope than a lighter calf – increasing the impact on both horse and calf. Secondly, the heavier the calf, the greater the risk that it will take the competitor longer to flank the animal, prolonging the event. There also has to be a line at the lower end of the weight range to ensure that calves are robust enough for the event, and for public perception. I have no scientific evidence to back the recommendation I am about to make, but just as a suggestion based on my experience and conversations with others, perhaps a tighter acceptable weight range of 90kg-130 kg liveweight would be optimal? I definitely do not subscribe to the assumption that heavier is better.”</p>	Noted
	19	MS3 - Delete h), l) and k) (i-iii and v-viii). Add “no animals other than horses are to be used”	Disagree
	29	It is confusing that not all species/events are listed within this MS as to the allowed frequency of use. If this was read, and not subsequent MSs, it could be thought that contract calves (as cattle) could be ridden 3 times. We would suggest that all frequencies should be in one MS.	Agree
	29	There should be an MS requiring adequate identification of animals so that frequency of use can be monitored.	Disagree
	29	<b>MS 4(i)</b> – The use of the word “prodded” in this standard could be confusing, given that the three	Agree. Moved (c)

		previous and two following standards relate to electric prodders, with one (4(h)) limiting their use to adult cattle. If sheep are to be used, they should be included in standard 4(i) as well.	to after (e)
	17	<p>The NZRCA recommends that the minimum standard stays at 100kg. This is a good weight and has worked very well in past years. The PRCA (Professional Rodeo Cowboys Assn) of America’s weight range for calves is between 220 pounds (100kg) to 280 pounds (127kg)</p> <p>There are concerns over the welfare of the calves used in rodeos, and the NZRCA itself polices this event closely, penalizing competitors who mis-treat calves.</p> <p>REDACTED stated that in 16 years as an attending veterinarian at PRCA rodeos in Arizona, “I personally have not seen a serious neck injury to a tie-down roping calf” (rope and tie calf). Statistically the rate of injury to these animals is relatively low. In 1994 a survey of 28 sanctioned rodeos was conducted by on-site independent veterinarians. Reviewing 33,991 animals’ runs, the injury rate was documented at 0.047%, or less than five-hundredths of one percent.</p> <p>A study of rodeo animals in Australia found a similar injury rate. Basic injuries occurred at a rate of 0.072%, or one in 1405, with injuries requiring veterinary attention at 0.036% or one injury in every 2810 times the animal was used, and transport , yarding and competition were all included in the study.</p>	Weight is kept at 100kg.
	23	<p>The SPCA believes only strong, fit, healthy and suitable cattle and horses should be allowed to participate in rodeos. We further believe that no animal below 200kg in weight should be used in any rodeo event. We would state at this point that our research has led us to conclude that all other minimum weights in the draft appear to equal international equivalents.</p> <p>For this reason <b>the SPCA submits</b> that Minimum Standard No. 3 – Selecting Animals, have part (k) (viii) removed and replaced with the phrase: “<i>Animals other than cattle or horses must not be used in rodeo events</i>”, and part (k)(i) removed and replaced with the phrase: “<i>Calves (for rope and tie) 200kgs</i>”.</p> <p>The SPCA is also concerned that throughout New Zealand there appears to be no weighing of stock at rodeos and any judgement made as to the weight of each animal is done purely by sight. This speculative approach is unacceptable and makes a mockery of any minimum weight requirements as prescribed in the code. The SPCA suggests that it should be a minimum standard that all competing</p>	<p>Noted</p> <p>Agree that only cattle and horses should be in rodeo, code amended. Calf weight to stay at 100kg</p>

		<p>stock are weighed prior to the rodeo so as to be sure they fall within the ranges specified for each event. This could be done on or off site with each numbered animal given a matching docket that includes details of that animal including its weight.</p> <p><b>The SPCA therefore submits that</b> Minimum Standard No. 3 – Selecting Animals, have the following phrase added: <i>“All competing animals must be weighed no more than 48 hours prior to the event in which they will be used and this weight recorded on a docket for auditing purposes”</i>.</p> <p>The SPCA is aware of a recent instance where a horse which was known to have a history of going down in the chute was selected for use and subsequently suffered the same result. We feel strongly that any animal that has a history of becoming overexcited, stressed or anxious in a rodeo event is no longer selected to compete.</p> <p><b>We therefore submit that</b> Minimum Standard No. 3 – Selecting Animals, have the following clause added: <i>“Any animal that is known to have a history of misadventure such as going down or attempting to jump out of a chute must not be selected for future events”</i>.</p>	<p>Disagree - impractical</p> <p>MS 3(h) states that animals must not be used if they are likely to injure themselves if placed into a chute</p> <p>Disagree; but MS added that all animals must be contracted</p>
	12	<p>Suggest that the sentence ‘Rodeos involve situations where animals may be subjected to a risk of injuries and distress’ is changed to read ‘Rodeos involve situation where animals will be subjected to a risk of injuries and distress, and in many cases will be subjected to injuries and distress’.</p>	Disagree
	29	<p><b>4.2 Handling, RBP (e)</b> – Some members have queried this RBP as well as MS 9(b), saying that some manipulation of the tail can be useful in encouraging an animal to move. We understand that this RBP is consistent with the Dairy Cattle Code of Welfare, and that it is there to safeguard against the kind of force that can damage or even break a tail. Might there be a middle ground?</p>	Disagree. Wording not changed
	17	<p><b>Calves (for calf riding with rider &lt;40kg) 200kgs</b>  The NZRCA wishes that the minimum weight stays at 150kgs.  A 200kg calf is a strong, powerful animal and with the maximum weight for a rider being only 40kg (as</p>	Weight not changed

		set in the NZRCA rule book) 200kg is too big. The risk of serious injury to our children would be increased considerably if this weight change was to come into effect.	
	17	<b>Calves (for calf riding with rider 40-50kg) 250kgs</b> The NZRCA recommends this standard be deleted. There is no event pertaining to the rider weight range of 40-50kg as our maximum weight is set at 40kg for calf riders.	Disagree
	19	MS4 - Delete any references to cattle and sheep in a) and b) Delete f) and substitute "f) goads must not be used" Delete g and substitute "g) electric prods must not be used" Delete h) to k)	Disagree
	23	<p>The SPCA holds the view that the use of electrical devices used to deliver shocks to animals should be heavily restricted to those instances where their use is absolutely necessary. To that end we are heartened by the minimum standards currently in the draft but do have some amendments we think would help ensure welfare is not compromised by intentional or unintentional misuse.</p> <p>We feel strongly that electric goads should not be used on animals other than adult cattle at any time. The placement of minimum standard (i) directly after minimum standard (h) appears to give the impression that prodders may be used on horses. We would ask NAWAC to clarify this by reorganising the order of standards (i) and (h).</p> <p>As is often the case we can see no valid reason why the recommended best practice indicators are not minimum standards. <b>We submit that</b> best practice indicator (f) be transferred to a minimum standard and read: <i>"Electric goads must not be applied to any animal for more than one second at any one time"</i> and <i>"Electric goads must not be used more than four times on one animal in any 24 hour period"</i>.</p> <p>The SPCA also disagrees with the need for horned cattle to be used in rodeo events if the presence of such animals appears to cause such health risks for both animals and people. We fail to see the point in</p>	<p>Agree; standards re-organised</p> <p>Disagree; Impractical to police</p> <p>RBP added that horned cattle</p>

		<p>selecting horned cattle to be used and then have a statement in the code suggesting that horned cattle have the tips of their horns removed.</p> <p>We are aware of evidence from rodeo events across the globe where tail manipulation is performed in a manner that causes high levels of distress and pain to the affected animals. This is a highly sensitive area of both cattle and horses and any pain or distress caused is heightened by the animals' confinement.</p> <p><b>We therefore submit</b> that recommended best practice indicator (e) <i>"tails should not be lifted, pulled or twisted"</i> be inserted into Minimum Standard No.4 – Handling as a minimum standard.</p>	<p>should not be selected</p> <p>Disagree</p>
<b>Section 5 - Equipment</b>			
	15	<p>Other sections of the code spelling out the severity of the torture devices that are employed also speak volumes about the true nature of rodeos. Minimal standards concerning rowels on spurs, flank straps, and goads will not end or even limit the agony inflicted on animals in events such as bronc and bull riding. This is especially true because the code is silent about other devices used to torment rodeo animals, including wire tie-downs, bull hooks and whips, and other shocking and stabbing devices besides electric prodders.</p>	Disagree
	19	<p>Spurs, rowels, whips and electric prods must not be used. Horse riding in itself is not necessarily inhumane, providing gentle training methods are used, and there is a bond between the horse and his rider and/or trainer. However, much of the equipment used in rodeos is inherently inhumane, and is designed to be so, since the spectacle comes from watching the antics of scared, aggressive horses, not calm, well trained ones.</p>	Disagree
	19	<p>Use of flank straps must be banned pending further research - Flank straps, tied around the back end of bucking horses to encourage them to buck, are controversial. Animal advocacy groups like PETA and</p>	Disagree – horses may be trained to

		<p>SAFE consider that these are painful, and the animal bucks because he is in pain. In their 2002 submission on the now operational Code of Welfare for Rodeos<sup>1</sup>, SAFE cite a rodeo bronc rider and veterinarian, who states that the flank strap encourages the horse to keep bucking until he injures himself<sup>2</sup>. The footage of the Claudelands rodeo from the SAFE website clearly shows bruising on a horse caused by the flank strap. On the other hand, proponents of rodeo, and some industry veterinarians<sup>3</sup> contend that the flank strap is not painful, and that if horses were in pain they would not buck.</p> <p>Missing from the debate are any peer reviewed scientific observations or experiments from independent scientists or veterinarians supporting or refuting the hypothesis that the flank strap is painful. However, there is sufficient circumstantial evidence to take a precautionary approach and to ban the use of flank straps until those supporting their use can come up with research that will allow it to be reinstated.</p>	buck
	17	<p><b>MS 6 (h) Ropes or straps with bells or other noise-making equipment must not be connected to animals.</b></p> <p>The NZRCA has the stance that if this standard remains in the code and our bull riders are unable to use a bell on their bull ropes this will increase the risk of injury to our arena personnel. The bell is there as a safety feature to alert people of where the animal is as well as a weight to release the rope off the animal almost instantly when the rider dismounts. It eliminates the possibility of the rope getting wrapped or tangled around the bulls' legs or possibly getting caught on something when entering the unsaddling chute. The bull rope is about 4 meters long and therefore safer for the animal if it comes free immediately.</p> <p>The NZRCA therefore recommends that this standard is removed from the code.</p>	Disagree. Ropes or straps must not be weighted with noise-making equipment
	10	<p>Minimum Standard No6 – Gear</p> <p><b>H) Bells OR Noise Making Equipment must not be connected to Animals.</b></p>	Ropes or straps must not be

		BRNZ seeks clarification on this minimum standard: - Suggestion; if “Noise Making Equipment” is a concern; all Bell Knockers to be removed, as the weight of the Bell helps the Rope to fall freely from the Animal once Rider has departed Animal.	weighted with noise-making equipment
	29	<b>MS 6(a)</b> – Member comment: <i>“Does this just refer to bucking stock? Inspected by whom? It is unrealistic that an official might be able to check all of the gear used on all of the horses involved in the rodeo- particularly the timed events”.</i>	Agree
	29	<b>MS 6(g)</b> – Flank straps are also used on bulls and steers, not just horses.	Noted, wording changed
	19	MS6 Delete c) and substitute “c) spurs must not be used” Delete d) to f) Delete g) and substitute “g) Flank straps must not be used”  The ban on flank straps can be reviewed the next time the code is up for review, if there is sufficient evidence that they do not cause any stress or pain to the horse. The burden of proof must be on the industry to prove they are not harmful.	Disagree
	17	<b>MS6 - Recommended Best Practice (d) Ropes used in rodeo events should be pliable, at least 15mm thick and not be made of a material likely to cause burns or injuries to the hides of animals.</b> The NZRCA wishes that this recommendation be looked at, because there are NO 15mm ropes used in ROPING events due to them not being manufactured in this size and therefore being unprocurable. Most ropes have a diameter of around 11mm.	Agree, wording changed
	7	Minimum Standard # 6 page 15 Gear. [ g ] There is no evidence to support that bells on bull ropes frighten or are detrimental to the animal. The bell serves to help release the rope from the animal after the rider has dismounted, it also alerts any Arena personnel in the vicinity of the bull’s presence. Bells are not used on any other class of animal. Bells are however use on many animals around the World, parade animals, cows, bulls, horses, goats sheep, cats and reindeer with no visible harm.	Disagree

	29	<b>MS 6 - 5.2 Gear, RBP(d)</b> – Member comment – <i>“The specification of 15mm is unrealistic. The heaviest ropes which are used are about 11.5mm – and these are very heavy ropes. Ropes of an extra 40 odd percent diameter are unsuitable to use, and it is an unrealistic specification. Is there any evidence to suggest that 15mm is optimum?”</i>	Agree, wording changed
	7	page 16 Recommended Best Practice. Ropes used in Rodeo do generally include some nylon content , they are scientifically designed to ensure that they do not `choke` and they release as soon as pressure is taken off. A flexible rope will tighten and not release when pressure has been applied. Some ropes may be measure 11 mm and do not cause any ill effect upon the animal.	Noted
	7	MS6 - page 15 . Example Indicators This should read, “The minimum width of front girth on Saddle-bronc and Bareback-bronc horses is 200 mm. [ it does not apply to other horse for example pick-up or timed event horses.]	Agree but with different wording.
	29	Example indicators for MS 6 – We suggest that the second to last bullet should read – “When a saddle is used....”	Disagree
	23	As the document states, the type of gear and the way in which it is used can have a major impact on animal welfare. It is the position of the SPCA as previously advanced that the use of spurs and rowels can serve no purpose other than to cause unnecessary and unreasonable pain and distress to an animal in a manner that we simply cannot condone.  While we accept that the current draft code attempts to the use of spurs and rowels by applying measures such as blunting the ends and having at least some movement in the rowel, it is our belief that this form of entertainment could be carried out without the need for such equipment. Even blunted rowels are capable of leaving bruising and pain in tender areas of the body which may be subject to the same level of impact within 24 hours.	

		<p>The SPCA fails to see how attempting to hark back to a bygone era where horses and cattle were treated in an appalling manner, by sanctioning the use of equipment associated more with America's Wild West than contemporary New Zealand, can be rationally encouraged in our society today. It is our view that the flank strap is the device primarily used to encourage bucking and see no practical need for the addition of spurs or rowels. If the only remaining reason is one of aesthetics then we cannot see how it is justifiable.</p> <p>The apparent dichotomy between Minimum Standard 6 (a) and Minimum Standard 6 (b) serves only to further highlight the frailty of codes of welfare as they currently exist. The use of spurs in a rodeo situation will invariably cause levels of discomfort to the animals that are unacceptable; such is the nature of their purpose. How an inspector can consider an operator to have inspected his or her spurs or rowels before use to ensure they will not cause discomfort is more than a little perplexing.</p> <p><b>The SPCA therefore submits</b> that Minimum Standard No.6 – Gear, have parts (c), (d), (e) and (f) removed and replaced with the phrase: <i>“No spurs or rowels of any description must be used in any rodeo event where they come into contact with an animal”</i>.</p> <p>However should their use continued to be sanctioned, or in any event, we believe it would be a positive and advantageous addition for a minimum standard to be incorporated in the code whereby competitors are required to present, upon request, all equipment used in an event for inspection by either the attending veterinarian or animal welfare officer, or an attending inspector where present.</p> <p>We believe this would have the result of ensuring all gear at all rodeos is more likely to comply with the minimum standards due to the ability for a rider to be refused right of competition should their gear or equipment not meet the specifications.</p> <p>For this reason <b>the SPCA submits</b> that Minimum Standard No.6 – Gear, have the following clause added: <i>“All competitors must present their gear and equipment for inspection at the request of the attending veterinarian, animal welfare officer or a warranted inspector”</i>.</p>	<p>Disagree</p> <p>Agree but with different wording</p>
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		<p>The use of flank straps to apply pressure to an un-ribbed tender portion of the animal in order to make it buck is another area of concern. We accept that Minimum Standards 6(a), (b) and (g) attempt to regulate this practice but we feel that, once again, the wording is simply too vague. The example indicator and recommended best practice indicators appear to be more prescriptive and therefore practically relevant to ensure animal welfare is maintained.</p> <p>For example we see no reason why it should not be mandated that the flank straps are fitted correctly with the lined portion evenly overlying both flanks and the abdomen, or that the pads used under bareback rigging extend beyond a minimum length from the rigging.</p> <p><b>The SPCA therefore submits</b> that the following phrases be added to Minimum Standard No. 6 – Gear;</p> <ul style="list-style-type: none"> <li>a. <i>“Flank straps / ropes must be placed on the animal in such a way that the lined portion evenly overlies both flanks and the abdomen”</i></li> <li>b. <i>“Flank straps must be covered with material such as sheepskin or neoprene”</i></li> <li>c. <i>“Pads used under bareback rigging must be of an adequate thickness to prevent rubbing or chafing and must extend at least 5cm behind the rigging to protect the horses back”</i></li> <li>d. <i>“All pads and flank straps used in the event must be approved by the attending veterinarian prior to being used in the competition”</i></li> <li>e. <i>“The minimum width of the front girth in the saddle and bareback bronc riding classes must be 200mm”</i></li> <li>f. <i>“Bits must not contain any rough or sharp surfaces which may cause damage to the mouth”</i></li> <li>g. <i>“Flank straps must not be tightened more than twice on an animal in the chute”</i></li> </ul>	<p>Disagree</p> <p>See MS 6 (g)</p> <p>Disagree</p> <p>Already an example of the MS</p> <p>Disagree</p> <p>Disagree</p> <p>Disagree</p>
<b>Section 6 – Special Requirements</b>			
	19	Any activities performed on animals other than horses, must be banned with immediate effect. This includes steer riding, and any form of cow roping. The latter is a particularly inhumane practice that can cause injury to the cows when they are jerked to a halt by their neck after running at full speed.	Disagree – but sheep removed

		This is something NAWAC itself points out in the draft code. Cows, steers and sheep are not trained to be ridden, and therefore will suffer from fear and stress at this unfamiliar handling, even where there is no physical injury	
	23	<p>The SPCA is strongly opposed to the use of spurs and rowels as well as events including but not limited to bronco riding, calf roping and steer wrestling where injuries are most likely to occur. <b><i>Should the ministry not see a prohibition on the use of animals in rodeos as viable then it is the position of the SPCA that at a minimum the use of the following devices and practices be banned from all rodeos.</i></b> A. Spurs and rowels, b. Calf riding, c. Calf roping and d. Steer wrestling</p> <p>It is our position that the welfare impacts from these specific events and types of equipment are such that no justification can be made for their use on animals in New Zealand, and that to sanction any such use would be in direct contravention of the purpose of the Act.</p>	Disagree, calf riding and roping not removed
	12	In our view, all the events are unacceptable on welfare grounds, involving violent manhandling of animals, use of spurs on horses and many other unacceptable treatments.	Disagree
	12	In the saddle and bareback riding - 'the horse will be fitted with a flank strap which will encourage the horse to buck'. This 'encouragement' must involve pain or at least severe discomfort.	Disagree
	29	<b>MS 7 General Information</b> – Pick up riders also pick the rider up off the bucking horse safely, and remove the flank strap, important for animal welfare, thus bringing the event to an end.	Noted, wording changed
	7	Minimum Standard #7 Saddle and Bareback Riding [ q ] I think this should refer to the 'flank strap'.	Noted
	15	My main concern is with bronc riding, in which normally placid horses are induced to throw off their riders through the use of 'bucking' or 'flank' straps, spurs, and prodding devices. The sole purpose of bucking straps is to torment the horse by having a belt constrict its sensitive flanks. It is a common misconception that the horse stops bucking when it dislodges its rider. What actually happens is that as	Noted

		<p>soon as the outriders release the bucking strap, the horse stops bucking regardless of whether the rider is on board or not. Thus, the horse is in effect being tortured by the strap until it is released.</p> <p>However, that is not all; to further aggravate the horse, it is prodded or poked while in the chute so it will buck when the gate opens. In addition, the rider is required to scrape the horse's shoulders with his spurs so the horse continues to buck after the chute opens. How anyone cannot recognize this 'sport' for what it is -- a deliberate tormenting of an innocent animal for public entertainment and private profit -- is beyond me.</p>	
	16	<p>Regarding the 'bucking bronco' horses.  These horses ARE abused... and are most certainly NOT happy, adjusted animals. Outside of the world they are currently exposed to, perhaps they would be?  IF these horses buck 'naturally' (as has been argued) then why is there a strap pulled across them to add that much discomfort, that they do, indeed buck?  This is, in my books, is animal abuse and needs to stop!</p>	Noted
	19	Delete MS 7a)	Disagree
	23	<p>Saddle and Bareback Bronc Riding - Due to the inherently distressful nature of the flank strap we believe that it should remain on the animals no longer than is absolutely necessary for the event to take place. <b>We therefore submit</b> that the phrase <i>"The flank strap must be removed from the horse as soon as it is practicable to do so once the rider is off the horse"</i> should be added to minimum Standard No.7 – Saddle and Bareback Bronc Riding.</p>	Agree to add the phrase
	7	<p>Bull or Steer Riding .  Introduction. Delete the words `back cinch` to read " The animal is also fitted with a flank strap to encourage bucking."</p>	Agree
	7	<p>Page 18 Minimum Standard #8 Bull and steer Riding.  [ b ] delete `back cinch` word should be `flank strap`.</p>	Agree

		[ c ] delete `pickup riders` and replace with `Bull fighters or Protection clowns`.	Disagree
	12	In the bull and steer riding ` The animal is also fitted with a flank strap to encourage bucking` – again this treatment is significantly negative for welfare.	Noted
	19	Delete MS 8. Substitute “bull and steer riding is prohibited” Delete MS9. Substitute “rope and tie is prohibited” Delete MS10. Substitute ‘team roping is prohibited’ Delete MS 11. Substitute ‘steer wrestling is prohibited’ Delete MS12. Substitute ‘calf and sheep riding is prohibited’	Disagree except that sheep riding is prohibited
	29	<b>MS 9(e)</b> – Member comment: <i>“The rope is already fixed to the saddle horn before the event begins. This is why if a calf gets caught around the body by accident - the cowboy must continue with the event to catch and restrain the calf so that the horse and calf are quickly released. It is not possible for the cowboy to just let go of the rope because it is attached to the saddle horn, with the calf pulling one way and the horse pulling the other keeping it tight. This should also be changed in the introduction – the rope is already fixed to the saddle.”</i>	Noted
	29	<b>Rope and tie, RBP ©</b> – Member comment: <i>“For practicality of policing, there needs to be a set distance here. These horses are trained to keep the rope tight, and any change to the resistance at the end of the rope will mean that the horse may slightly overcompensate. I recommend that this be changed to “...or if the rope horse drags the calf further than 5 metres”</i>	Disagree, the calf should not be dragged
	7	NAWAC call for comments: `I would recommend that NAWAC Members be familiar with 2003 Survey commissioned by NAWAC `` The Effects of Roping on the Behaviour and Physiology of Calves in a Rodeo``.  Reference is made regarding dragging or ``busting``, the incidence of both these is not that common and is dealt with by way of penalty to the contestant. Calf injury rates recorded since 1991 show between .2% - .7% per Season with the majority being temporary lameness, this low rate can be	Noted

		<p>attributed to a number of reasons;  Increased awareness of stock selection  Improved ground conditions  Increased use of contract calves  Better technique by contestants</p>	
	7	<p>Minimum Standard #9 Rope and Tie.  [e ] Delete this. In practice it is necessary to continue the run and tie the calf, this then enables the rope to be safely removed with minimum stress to the calf.</p>	Disagree
	27	<p>The CRA supports MS9 and RBPs for this event.</p> <p>The CRA exceeds to MS by using the 'long chute system' which means that the calf has the advantage. If they are caught, it would usually be by a very experienced roper with a well trained horse. This alleviates, or at worst, significantly reduces the penalty occurring situations such as 'busting' or 'dragging'. The CRA would not support a reduction of MS9 or RBP.</p>	Noted
	12	<p>Rope and tie – 'NAWAC has concerns about the welfare implications of this event' as 'incorrect technique such as dragging or busting the calf in this event can negatively impact the calf by subjecting it to unreasonable physical stress, which can result in injury'.</p>	Agree that NAWAC has concerns about the welfare implications here
	15	<p>My other major concern is with the barbaric practice of calf-roping, in which it is not uncommon to snap the neck of the calf from the force of the rope being stretched from the the rider's saddle. There are much more humane ways to demonstrate a rider's skill in singling out a calf and separating it from the herd. In fact, there are many ways that Kiwi 'cowboys' can demonstrate traditional cowboy skills without abusing horses or cattle; these include barrel racing, riding mechanical bulls, rope tricks (either on the ground or on horseback), calf-cutting in which one calf is quietly separated from a herd by a team of two riders, trick riding, etc.</p>	Noted
	17	<p><b>(e) When roping, if the rope falls around the body of the calf, the competitor must not continue with</b></p>	Agree

		<p><b>the rope and tie.</b>  The NZRCA wants this standard removed.  Reason: It is in the best interest of the calf if the cowboy keeps going and the calf gets its legs tied. This enables the arena personnel to come in and release the calf quicker and in a manner that will cause LESS stress to the calf. The cowboy does not have a quick release button on their rope.</p>	
	23	<p>Rope and Tie - As per our statement at paragraph 19, the SPCA can see no reason whatsoever as to why this particular type of activity should be allowed to continue in New Zealand. As the document correctly points out the “sport” of steer or calf roping has been banned in SA and VIC in Australia (as well as the ACT where rodeos themselves are prohibited) alongside a good deal of countries including Germany and the UK, as well as Vancouver, Canada and of course Auckland, New Zealand.</p> <p>The SPCA strongly urges NAWAC and the ministry to ban this event and <b>therefore submits that</b> part 6.3 of the draft code be removed in its entirety and replaced with a prohibition on this event.</p> <p>Should the ministry decide not to prohibit this event then it is our position that some mitigation may be added through the allowance for the competitor to take extra time in order to slow the calf down before dismounting. This extra time, we suggest around five strides, would at least allow for the roped calf to come to a halt before being brought to the ground.</p> <p><b>The SPCA therefore submits</b> that Minimum Standard No. 9 – Rope and Tie, have the following clause added: <i>“The calf must be afforded time to slow and stop before the horse is reined in and the rider dismounts”</i>.</p>	<p>Noted</p> <p>Not removed</p> <p>See MS9(c)</p>
	29	<p><b>6.4 Team roping</b> – The following sentence <i>“The time recorded is that after the steer is stopped and there is (no slack) slack in both the header and heeler’s ropes”</i> should read NO slack.</p>	<p>Agree, wording changed</p>
	23	<p>Team Roping and Steer Wrestling - These particular events carry with them such levels of discomfort, distress and pain to the animals involved that the SPCA can see no justification for their continuation in New Zealand. The difficulty with any other approach is highlighted by the somewhat minimal wording</p>	<p>Disagree</p>

		<p>of the minimum standards, example indicators and recommended best practice indicators. This suggests to us that these activities are either carried out with acceptance of the pain and distress caused, or prohibited; due to their brutal nature there appears to be very little that can be done in order to mitigate any of the suffering incurred.</p> <p>The SPCA strongly urges NAWAC and the ministry to ban these events and <b>therefore submits that</b> part 6.4 and part 6.5 of the draft code be removed in their entirety.</p> <p>Should the ministry opt not to prohibit these events then the SPCA would seek that any form of tail manipulation is prohibited during steer wrestling. <b>We therefore submit that</b> Minimum Standard No.11 – Steer Wrestling, have the following clause added: <i>“Tail manipulation of any type must not be performed during steer wrestling events”</i>.</p>	
	29	<p><b>MS 11(a)</b> – Member comment – <i>“Proper technique requires a change in direction and the use of momentum, so replacing "brought to a stop" with "his direction is changed" would be more appropriate.”</i></p>	Agree but with different wording
	7	<p>MS #11 Steer Wrestling. Add `or change of direction` after the word `stop` , changing direction of steer slows the momentum down prior to throwing the steer.</p>	Agree but with different wording
	29	<p><b>6.5 Steer wrestling RBP (a)</b> – A member comments that no ropes are used in this event.</p>	Agree, wording changed
	17	<p><b>MS11 (a) The steer must not be knocked down or thrown before it is brought to a stop and the catch is made.</b> The NZRCA would like NAWAC to take note of Rule 14.31.2 sentence 3 for definition of stop “Change of direction of steer is considered stopped”. The NZRCA recommend that the above standard now reads <b>(a) The steer must not be knocked down or thrown before it is brought to a stop and the catch is made. (Change of direction of steer is considered stopped)</b></p>	Agree but with different wording

	29	In terms of sheep riding, the Sheep and Beef Code of Welfare p9 has an RBP (j) that states “sheep should not be dragged or lifted by the wool or horns”. We would suggest that this should also negate the equivalent activity of the gripping of wool to maintain a position on top of the sheep. In addition, the maximum rider weight on the minimum sheep weight would result in the animal having to carry nearly a third of its bodyweight, clearly excessive. The NZVA considers sheep riding should be banned from rodeo events.	Agree
	27	The CRA supports and practices MS 12 and RPB with the following additional recommendations  1. A minimum age of the sheep being used. This would ensure that the animal has sufficient muscle and skeletal confirmation to support the 20 kg of the rider.	Sheep riding removed from code
	12	Sheep should not be used in rodeo events	Agree
	17	<b>NAWAC call for comments</b> - The NZRCA does not condone or encourage sheep events at its Rodeos.	Agree
	23	Calf and Sheep riding - The SPCA takes the position that the values we place in our children and youth are those which are often exhibited in their adulthood. Countless studies and academic papers point to a direct correlation between a development of empathy in young children manifesting itself in empathetic views to both animals and humans in adulthood.  The SPCA strongly believes that fostering a positive and humane view of animals in New Zealand’s children has done and will continue to help reduce instances of animal neglect and abuse.  For these reasons the SPCA is fundamentally opposed to events involving children and the mistreatment of animals. Encouraging young people to place sentient animals in positions of high distress and discomfort for entertainment is not only outdated but is an inherently unhealthy way to grow a caring society.	

		<p>The SPCA would take this opportunity to point to the ministry's own words in the recent <i>Animal Welfare Matters</i> document where it talks of why animal welfare is important to New Zealanders:</p> <ul style="list-style-type: none"> <li>h. <b>It matters how animals are treated – it matters to the animal and it matters to us</b></li> <li>i. Animals are sentient, which means they can feel pain and distress and have other experiences. All those experiences are important to the animal and it matters to us as a society how animals are treated.</li> <li>j. Animals may be used for human benefit, but such use must be carried out without unreasonable or unnecessary suffering to the animal. <b>We should seek ways to reduce pain and distress to animals by improving our practices.</b> Ideas of what is humane, or what is reasonable and necessary, evolve over time</li> </ul> <p>The SPCA is fully supportive of these views and urges NAWAC and the ministry to remain true to the intent of the strategy by improving practices such as rodeos rather than remaining stagnant or indeed regressive.</p> <p>For these reasons <i>the SPCA submits</i> part 6.6 of the draft is removed in its entirety and that calf and sheep riding events be prohibited.</p>	Sheep riding events removed
	18	<p><i>NAWAC call for comments about the welfare implications if sheep riding in rodeos.</i> The Federation does however note the NAWAC call for comments with respect to the animal welfare implications of sheep riding in rodeos and (by implication) at other events where sheep riding takes place on occasion, such as Agricultural and Pastoral (A&amp;P) Shows. The Federation believes that events such as sheep riding, properly managed and giving due regard to the welfare of the animals involved, are part of the fabric of rural society, contribute to the regard that children have for the animals they work with and play an important role in educating children about animal welfare. The Federation therefore submits that, suitably managed, this event should remain as part of rodeo programmes.</p>	Disagree. Sheep riding removed from code
	23	<p><b>Barrel racing</b> - The SPCA is of the opinion that speed based obstacle events such as barrel racing bring</p>	Disagree

		<p>with them a high level of risk to animals that are not appropriately trained for the quick turns and stops required. This level of risk is heightened in a rodeo situation where large crowds, noise, lights and other highly stressed animals are present.</p> <p>In order to minimise the risk we believe only suitably trained and experienced barrel racing horses should be used in such events at rodeos. We once again would wish to see spurs not used and that the course design is mandated to allow for an adequate run off area to avoid injury. The whipping of horses should also be prohibited.</p> <p>The SPCA is of the belief that horses used in this event should be controlled by hands and heels only and not be subject to excessive use of equipment especially the mouthpiece of the animal.</p> <p><b>The SPCA therefore submits</b> that Minimum Standard No.13 – Barrel Racing, have the following phrases added: <i>“Only horses previously trained and accustomed to barrel racing may be used in a rodeo”, “Spurs must not be used”, “No whipping of any kind is to be used during this event” and “Sufficient space of at least five horse strides in length must be provided past the finishing line of this event to allow horses to stop without risk of injury”.</i></p>	Agree but not as a MS
	29	<b>Example indicators for MS 13</b> – 3 <sup>rd</sup> bullet point – Insert apostrophe – “horse’s”.	Agree
<b>Section 7 – Health, Injury and Disease</b>			
	7	MS #14 - Example indicators. Delete 4 <sup>th</sup> paragraph , The Animal Welfare Officer must not be able to over-ride the Veterinarian`s decision.	Disagree
	29	<b>MS 14(g)</b> – We suggest that this standard read “Stock must not be exposed to fireworks”.	Agree but in MS 5
	29	<b>MS 14(h)</b> – A member queries whether this refers also to horses owned by competitors in timed events, with the suggestion that this would be unrealistic.	It applies to all animals in the rodeo

	29	<b>Example indicators for MS 14, 4<sup>th</sup> bullet point</b> – Comment that the veterinarian should have the final say as having the most appropriate expertise to make the decision.	Disagree
	19	Delete MS14 g). Substitute “g) fireworks must not be let off within 200m of horses. Noise levels in the arena and horse enclosure must be restricted to [noise limit]dBA. The acceptable noise limit must be determined by independent research.	Agree but with different wording – see MS 5
	19	No fireworks or loud noises must be used in horse-riding events. Other horse-riding events such as dressage and gymkhanas are generally quiet affairs. Organisers and participants show respect for the horses by not making loud noises or violent movements. Fireworks scare the horses and should not be allowed. The lower decibel limit for noises that could cause distress for horses needs to be established, and the code of welfare needs to ensure that this limit is not breached.	Agree but with different wording - see MS 5
	23	<p>As submitted in paragraphs 21 to 25 the SPCA is of the opinion that a minimum requirement for events such as rodeos, where animals are placed in welfare compromised situations, is the presence of a suitably qualified veterinarian throughout the entire meeting.</p> <p>The example indicator point stating that all injuries sustained by animals are to be treated immediately is, we feel, worthy of being stated as a minimum standard in this section. We further believe that it be mandated that animals which sustain injuries from which recovery is unlikely and which are therefore are to be euthanised are to be destroyed in the arena where necessary. Screens should be available at all events to facilitate this should it be necessary to shield the destruction from crowds or other attendees.</p> <p>As a reference to this topic we would point to the recent events at the Warwick rodeo in Southern Queensland in which a bull suffered an irreparably broken leg and required euthanasia<sup>4</sup>. It is our firm belief that animals suffering fractures or other such injuries which restrict their movement and which make it inhumane to transport out of the arena must be destroyed on site. Raising and moving animals</p>	<p>Agree – MS 1 (d)</p> <p>It is an indicator of the minimum standard</p> <p>Not an animal welfare matter</p>



		<p>together with someone competent to use such weapons, is available for use at any rodeo event.</p> <p>b. A member has suggested that the term “conveyance” be clarified to ensure that a non-ambulatory injured animal is lifted onto/into a trailer (for example) for removal, as opposed to being dragged behind a vehicle.</p>	<p>rodeos</p> <p>Agree</p>
	12	‘Animals may become injured during a rodeo event and it may be necessary to humanely kill an animal in order to prevent it suffering further pain or distress’. This is clearly frequent enough to require serious consideration, including an Appendix on methods of euthanasia.	Disagree – most codes have an emergency euthanasia section
	15	The danger posed to animals by participating in rodeos is obvious from Section 8 of the proposed welfare code, which is devoted entirely to "Emergency Humane Destruction". What other 'sport' in New Zealand has regulations dealing with how to kill one of the participants in that sport?	Noted. Most codes have an emergency euthanasia section
	19	If the conditions suggested are adhered to then there should be no need for humane destruction. However, since the unexpected can always happen, this standard may be left in place. Only trained veterinarians should be allowed to euthanise animals. Delete MS 15 and substitute “Only veterinarians trained in euthanasia should be allowed to kill animals. This should be conducted in a way that does not cause any pain or distress, according to good veterinary practice”.	Disagree – this may cause delays
	7	Page 26 Minimum Standard #15 Humane Destruction. Add [ g ] Any person using a firearm must be a Registered Firearm user.	Agree, but this is not an animal welfare matter
<b>Glossary</b>	29	<p>1. The following are in the Glossary but not in the text of the code:</p> <p>a. Chute fighters</p> <p>b. Rough stock</p>	Noted
<b>General Comments</b>			
	2	Rodeos have no place in New Zealand. We specialize in animal product exports to countries where the	Noted

		practice has been banned e.g. EU. In this role we promote our 'clean, green and <b>Humane</b> ' image. How can we be seen to be 'humane' with this so called 'sport' allowed to continue? It's totally ridiculous.	
	12	Holding rodeos is incompatible with New Zealand's reputation as a leader in animal welfare.	Noted
	2	As an export country, with our consumers becoming more and more concerned about how animals are treated, there is no way AWAC should allow rodeos in NZ.	Noted
	2	The views and needs of the Rodeo Cowboy's Assoc to be allowed to have their 'sport' carries no weight when it comes to our export trade. They make no contribution to it.	Noted
	2	The RCA boast that rodeos were part of Kiwi culture. They never were. We never needed to handle animals by roping and buck jumping them as in the prairies of the US where it all came from.	Noted
	24	We have more British Immigrants in this country than American, so we should reflect the dominant immigrant - Britain and all of UK BANNED rodeos forever as cruel, in 1938. Is New Zealand this far behind the times.?	Noted
	25	Rodeos are already banned in many countries, such as the United Kingdom (who banned them in the 1930s), and certain states of Australia and the United States, and the Waikato SPCA joins other welfare organisations in calling the New Zealand government to join these enlightened governments in banning these cruel events in our own country.	Noted
	24	New Zealand is trying to present a clean green ethic to tourist markets and this continuing of events which allow smelly men to get around in cowboy costumes does NOT help our case.	Noted
	30	Any form of civic funding for rodeos should stop immediately. Frightening and hurting animals for pleasure is primitive and a very bad look for NZ.	Noted
	23, 24	We firmly believe that rodeos are detrimental in terms of fostering a caring attitude toward living	Noted

		creatures.	
	2, 25	There is endless evidence that treating animals badly results in people treating humans badly. There is no worse way to show children how to abuse animals than in rodeos.	Noted
	5	Cruelty against animals also harms society as a whole; it signals and normalizes insensitivity in children who can become numb to the suffering of living beings. It is also known to influence certain people to commit violence to other humans.	Noted
	9	Please reconsider and ask whether our nation's children should be seeing examples such as rodeos, where we adults appear not to consider or care that innocent animals are subject to severe pain, distress and risk of death? There are more than enough activities "teaching" children (our future citizens and administrators!) that cruelty to animals does not matter – that they don't feel pain and fear etc.!!	Noted
	8, 20	The sight of calves and sheep being forcibly ridden by children is particularly abhorrent to me as the animals concerned are clearly terrified and it sends a bad message to children about the way these particular animals should be treated.	Noted
	11	Rodeos cause harm in the sense that people (especially children) learn to accept and enjoy the aggressive exploitation of living creatures purely for the purposes of primitive entertainment.	Noted
	3, 24	There is no reason why we are in any way obliged look to present cruelty to the public as a form of entertainment.	Noted
	9	I think It is unreasonable and unjust that the public finds such displays "entertaining" and "enjoyable" – given that the pain and distress and danger to these animals is great. I think we are gradually getting over the awful habit of misusing animals in order to gain "pleasure" and spurious excitement for ourselves.	Noted

	24	There is more than enough ACADEMIC evidence to suggest the cruelty of animals involved in Rodeos, a bull is only bucking and butting away a threat, it is NOT engaging in an entertainment piece. When the threat leaves its zone...the bull is still.	Noted
	3, 9	We are a society that has many other more ethical forms of entertainment available for people to enjoy.	Noted
	5	We need to move forward in direction of a more compassionate society and take the important step to stop abusing animals as a mean of entertainment such as in rodeo shows (and others).	Noted
	22	Why should it be that humans are permitted to watch this for amusement and enjoyment/fun? Why is enjoying watching animals this distressed and injured permitted? We have to remember, that that is what it is about. It is not necessary or valid.	Noted
	23	We believe that that the skills demonstrated and promoted in rodeos are irrelevant in a modern society	Noted
	24	These decisions [to prohibit rodeos] need to be made by wise people with an ability to grasp the ethical question, the average rodeo attendee is not this type of person. They are paying to see an animal tortured and frightened into fighting for its life and they reframe this as the animals are taking part willingly in entertainment.	Noted
	1, 3	I'm opposed to this cruel/ inhumane treatment of animals.	Noted
	3	I was not even aware we had rodeo here in New Zealand, I honestly thought this country was above that savage barbarism.	Noted
	11	Rodeos cause harm to the innocent animals involved and harm to society	Noted
	21	Rodeos are inherently harmful and distressing to the animals involved. SAFE is totally opposed to events where animals are at risk of potential injury or mistreatment for the purpose of 'entertainment'.	Noted

	5, 22, 24	By their very nature rodeos deliberately subject animals to fear, stress and torment.	Noted
	23	The stress put on the animals involved constitutes an unreasonable and unacceptable level of pain and distress.	Noted
	5, 20	The animals suffer before and during such shows (often provoked with spurs, electric prods and flank straps)	Noted
	8, 25	A horse or cattle beast does not go into a rodeo arena and buck because it enjoys doing it. It is reacting to the pain caused by ropes and spurs and the fear of what might happen next.	Noted
	2	You don't need to be an animal behaviorist to see the pain and stress on the faces of animals being abused in rodeos, even for a short time. The argument that these stock are well cared for during the rest of their time carries no weight at all.	Noted
	3	Animals don't get a say in this treatment and it's foolish to think that they enjoy it. They clearly don't. This is bullying. That should be enough said.	Noted
	3,	We don't bully people, and if we do, we deserve to pay for it. There is not a single creature on the planet that enjoys being publicly tormented. Rodeo is a dangerous game to humans, but it's something completely different to animals, and I can't imagine they would think it's a game at all.	Noted
	18	Sentience and self-awareness cannot be accurately gauged across species line. While it is generally agreed that rodeo animals are sentient, it is strictly a matter of human convenience to adjudge their discomfort during rodeo events as insignificant, minimal, or acceptable. The convenience plays into a moral error which quite likely results in pain and fright for the subject animals.	Noted
	21	SAFE is fundamentally opposed to rodeos and other events that subject animals to undue stress and trauma likely to cause injury and suffering.	Noted

	22	Rodeo animals are also severely hurt. Mentally and psychologically they suffer horrendously. Their eyes tell their story. And their behaviour. The leap off the ground, back legs positioned way above their heads in movements we NEVER see elsewhere, tells the story of what these animals suffer. They are rendered out of their minds by rodeo. These are sentient creatures.	Noted
	24	The measurement systems in place currently only speak to bruises, cuts and breaks but there is additionally fear and torment. Indoor arena rodeo increases this with the use of pyrotechnics, loud PA systems and announcer styles, loud audiences etc	Noted
	25	The animals used are induced into bucking behaviour through means of painful prodding, use of spurs, and use of tightly cinched flank straps – the bucking is a result of the pain and distress caused by these methods. This also often leads to painful injuries, which can result in the death or need for euthanasia of animals on site. This undue distress, pain, and risk of injury is in direct violation of the Animal Welfare Act Section 4 (see above).	
	25	Nor is the handling of animals in rodeo events in accordance with generally agreed good livestock handling practices – contravening Section 10 of the Animal Welfare Act.	Noted
	5,8,19, 21, 24, 25	Rodeos are in breach of New Zealand's Animal Welfare Act which states that animals should be physically handled in a manner which minimises the likelihood of unreasonable or unnecessary pain or distress.	Noted
	12	The AWA 1999 states that 'a person commits an offence who ill-treats an animals. In our view, many or most of the treatments of animals in rodeos constitute ill-treatment and can be found within the draft code itself.	Noted
	19	Section 73(3) allows practices that cause suffering to animals and breach s. 10 to continue in "exceptional circumstances" but only under conditions set out in s.73(4). These include requirements	Noted

		<p>of religious and cultural practices, and economic effects. Rodeo is not part of New Zealand culture; it originated in the cattle culture of the western United States, not the sheep country of New Zealand. Any benefit it brings to the economy is slight, and would likely be more than offset by the economic harm that allowing such practices to continue would do to our image.</p> <p>Provisions of s.73 therefore do not apply, which means that rodeos in their current form are unlawful.</p>	
	21	There are inconsistencies and failures within the draft to sufficiently address basic animal welfare issues as required by the Animal Welfare Act 1999 (AWA). The very nature of rodeo events is based on asserting dominance, and inherently cruel practices that force animals to 'perform'.	Noted
	22	One of the International Five Freedoms for animals is protection from significant injury. Rodeo is in immediate breach of this Freedom and could not take place if the International Five Freedoms were upheld.	
	9, 13, 16, 19, 20, 21, 23, 26	BAN RODEOS COMPLETELY	Noted
	4, 14, 15, 18	Rodeos are cruel and barbaric and need to be stopped.	Noted
	8, 12, 21	I wish to submit that rodeos should be banned outright in New Zealand, making a code of welfare unnecessary.	Noted
	18	The code should be rewritten in such a way that rodeo cannot be practically carried out.	Noted
	11	We would like to see rodeo events phased out as soon as possible.	Noted
	5	The only acceptable option for rodeos is a complete ban anything else is endorsing the mis-treatment of animals and creating a tawdry spectacle for animal abusers.	Noted

	8	The calling of submissions on the draft code for rodeos implies that rodeos should continue in this country. Yet practices at rodeos must surely be seen by any thinking human being as a blatant breach of the current Animal Welfare Act.	Noted
	6	<p>In 2003 the Animal Welfare (Rodeos) code of Welfare 2003 – rubber stamped the rodeos entertainment industry this despite the many concerns and evidence of abuse and torture toward the animals who have the misfortune to be picked.</p> <p>The members of this committee, entertainingly called ‘on Welfare’, will rubber stamp this Rodeo entertainment industry of that I’ve no illusion.</p> <p>How this serves animal welfare? When calves, horses and cows are sent into the arena to entertain the crowds in an expression of human power games, sexual gratification and molestation and ego worshipping,</p> <p>In that respect, part of NZ’s culture has not moved on since the days of the Roman Empire, entertaining their citizens by sending prisoners into the arena with lions.</p> <p>To have the guts and stand up and speak for those that don’t have a voice, requires qualifications that don’t come on an A4 size paper you hang on the wall.</p> <p>For the cow, calf or horse being sent into the rodeo arena, with or without a so called committee on animal welfare, it will simply make not a blind bit of difference: it is going to be a matter of life and death at worst, at best it be traumatised for life.</p>	Noted
	13	How can a welfare code for a cruel and unnecessary practice that serves no purpose other than to indulge people with a 'cowboy' mentality and entertain ignorant and insensitive people, be viewed as other than a cynical joke?	Noted
	21	Inadequate minimum standards severely compromise the welfare and behavioural needs of rodeo	Noted

		animals resulting in widespread and routine, animal welfare problems. SAFE believes the draft fails to demonstrate even the most basic provisions of animal welfare.	
	21	The proposed standards reflect existing practices primarily based on entertainment, convenience and profitability, not animal welfare.	Noted
	21	The Animal Welfare (Rodeo) Code of Welfare does not reflect the views of an informed public within New Zealand.	Noted
	21	There is sufficient evidence to conclude that the proposed Minimum Standards and Recommended Best Practices contradict basic welfare standards.	Noted
	21	The proposed code ignores genuine animal welfare concerns and only serves to legalise unacceptable animal abuse. The proposed minimum standards contravene animal welfare principles by endorsing practices that inflict unnecessary torment and stress for the sole purpose of entertainment.	Noted
	22, 24, 26	Please, ban rodeo. It will happen one day. Show courage and leadership NOW and be part of the change.	Noted
	8	Rodeos are an import from North America and the activities set up for so-called "public entertainment" have nothing to do with the responsible management of horses and livestock animals in New Zealand. Calf roping is just one example of the double standard inherent in the whole sad business of legalised rodeos.	Noted
	19	Since the purpose of rodeos is solely for entertainment, and furthermore a harmful form of entertainment that reinforces dominance hierarchies and promotes an outdated Wild-West type macho culture, any form of pain or distress must be considered "unreasonable or unnecessary".	Noted
	16	Rodeos are not even part of the NZ culture, they are driven by male ego and scrutinised around the	Noted

		world as unacceptable.	
	26	It appears that no matter how much proof of injured, scared and even inevitable result of euthanized animals is provided in the form of video, photos and reports, people prefer to believe the good ol' cowboy and his professed call of love and concern for the animals' welfare.	Noted
	5	Anyone with a heart knows it's wrong to clothesline a baby animal, body slam it to the ground, tie its legs so it can't move, and drag it by the neck. If this were done to a puppy or kitten (or a child) the offender would understandably be charged with a crime and punishment awarded. In rodeos, however, it's called calf roping, and supporters claim it's a sport. But a sport, by definition, does not include involuntary participants.	Noted
	15	<p>I was shocked to learn that rodeos were legal and that the most brutal aspects of it -- bronc and bull riding along with calf-roping – were a common feature. As someone who grew up in America, I could understand the Wild West culture that was being presumably preserved by rodeos there, but it made no sense to me that New Zealand, with its history of agriculture and sheep-farming, would consider rodeos part of its heritage. It made even less sense because most forward-thinking parts of America had banned rodeos altogether or at least imposed strict limitations on activities involving violence to animals, yet New Zealand had no such restrictions.</p> <p>Most enlightened jurisdictions around the world (including the United Kingdom, the Netherlands, Australia's Capitol Territories, and even Auckland) have banned rodeos after seeing them for what they are: A way to showcase obsolete skills through the systematic abuse of animals for public entertainment and the profit of rodeo organizers. It wasn't that long ago that other forms of public entertainment using animals were considered socially acceptable; these include bear-baiting, and cock and dog fighting. Go back far enough and you'll find that throwing Christians to the lions was considered a legitimate way to entertain the masses. However, we humans pride ourselves on cultural and social advancement, and we are now much more sensitive about the cruelty inflicted on animals in these activities and others, such as circuses and bull fights. As people become more aware of what happens to animals at these events, they stop going and eventually the activities die out. That does not appear to be happening here.</p>	Noted

	15	<p>As the Royal New Zealand Society for the Prevention of Animals states in section 6.4 of its National Welfare Policy:</p> <p style="padding-left: 40px;">"The SPCA is opposed to the use of animals in rodeos.</p> <p style="padding-left: 40px;">The SPCA believes that the skills demonstrated and promoted in rodeos are irrelevant in a modern society, and that the stress on all animals involved is such that their welfare is put at risk. The SPCA is opposed to the use of spurs and rowels in rodeos, and is particularly opposed to events such as bronco riding, calf roping and steer wrestling, where injury to animals may occur. The SPCA believes that rodeos are detrimental in terms of fostering a caring attitude towards living creatures."</p>	Noted
	19	<p>The New Zealand Rodeo Cowboy Association (NZRCA) argues that injuries from rodeos are uncommon, but an examination of their own statistics shows that they are not so rare that they can be easily dismissed, especially given the requirements of s.4 that no "unreasonable or unnecessary pain or distress" be inflicted. The NZRCA recorded 42 injuries in the 1999-2000 season.<sup>5</sup> This only included physical injuries, and not the harder to measure fear, stress and other emotional trauma suffered by animals in rodeos.</p>	Noted
	12	<p>It is politically difficult to question the future of rodeos in NZ at this point, given the existing consultation, we urge NAWAC in reporting the outcomes of this consultation, to describe the condemnation of rodeos by some stakeholders such as WSPA and to express an intention to hold a general consultation on the acceptability of rodeos at some future, specified date.</p>	Noted
	20	<p>Why are we not taking heed from other countries such as Britain, most of Europe and many states in the USA who have placed complete bans. Even the Auckland City Council could see sense! No rodeos on their public land!</p>	Noted

	20	There is evidence on the Net and Youtube of sad, disgusting, graphic images – involving injury or death.	Noted
	22	In previous centuries Kings and Queens watched cats being set alight for amusement. Someone doing that these days would end up in prison, probably with a psychiatric report. When greyhound racing and rodeo have been confined to the history books for 50 years, future generations will look at what we permitted and wonder why we let it go on for so long.	Noted
	23	All animals are equally deserving of compassionate consideration and in order to prevent any cruelty and alleviate any suffering, animals should not be wilfully placed in positions of high stress and endangerment. This is even more strongly contended when the activities engaged in are done so for no other reason than the perceived entertainment value of animals struggling to free themselves from an unnatural environment.	Noted
	23	<p>The recent call for submissions by the ministry with regard to its proposal to create a New Zealand animal welfare strategy and amend the current Animal Welfare Act (the Act) brought with it an intention to create more enforceable animal welfare standards by replacing the current codes with a mix of regulations and guidelines. As suggested by us in our response to that discussion paper we are generally in favour of this idea and support the move away from the somewhat disconnected nature of the current codes to a more tightly worded regulatory system that is tied into the Act and its sanctions.</p> <p>The timing of this review, guided as it is by the 10 year statutory timeframe, comes at a time when the very existence of Codes of Welfare is under review and consideration. <b><i>The SPCA would submit</i></b> that rather than involve stakeholders, NAWAC and the Government's time trying to update the current code, it would be more beneficial to all involved should the process be suspended until all parties know what form any delegated legislation or guidelines may take in the future.</p> <p>We believe that, although intrinsically opposed to the continuation of animal rodeos, the current draft code has merits, and would transfer very well to a regulatory document with its minimum standards being directly enforceable should any breach of them occur.</p>	Noted

		<p>The SPCA would take this opportunity to highlight why suspending the code review until the Act itself has completed its review process is fundamentally necessary in order to ensure any standards prescribed are able to be enforced.</p> <p>Minimum Standard 14(g) in the draft code is identical to Minimum Standard 7(d) in the current code and reads "Stock must not be exposed to fireworks that are likely to cause them fear or distress". During a Hamilton event in November 2011 propane gas fuelled explosions were used in the arena with animals present; this footage can be viewed here: <a href="http://www.stuff.co.nz/waikato-times/news/6002238/Rodeo-declared-resounding-success-despite-protest">http://www.stuff.co.nz/waikato-times/news/6002238/Rodeo-declared-resounding-success-despite-protest</a></p> <p>We raise this particular example to show the enforceability issues with the format of the current codes. It seems to us that the intent of this specific standard is to ensure the pain and distress that the animals are already enduring is minimised by prohibiting the use of any firework, pyrotechnic or presumably any loud noise which may exacerbate that suffering. Clearly in the video the use of such effects has been planned and is used with little or no thought for the animals' welfare.</p> <p>The problem arises whereby should the operator continue to use such effects they would not be directly in breach of the Act and it would be necessary, in order to prevent future use, to lay a charge under 29(a), bringing with it the need to prove any unreasonable and unnecessary pain or distress.</p> <p>We put this forward as an example of where an amendment to the Act making it a direct offence to contravene any of the forthcoming regulations made under the Act would allow for far swifter and more sensible resolution to the problem. The operator could be advised that the regulation states "Stock must not be exposed to fireworks that are likely to cause them fear or distress" and that it is an offence to contravene any regulation.</p> <p><b><i>For this reason we again respectfully submit</i></b> that it would be most appropriate for no new codes to be developed or draft codes to be reviewed until these types of issues are addressed.</p> <p>However, should the review of the current code be completed in advance of any new statutory regime</p>	
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		then <b>the SPCA submits</b> that its contents in their entirety be subject to the same comprehensive consultation process which we trust will be undertaken with regard to all existing codes and their contents.	
	24	I oppose any form of Rodeo in NZ but specifically call for action for Indoor Rodeo events such as recently held at Claudelands and Dunedin. SAFE has video evidence taken from behind the stalls at Claudelands 2011 which clearly shows disrespect for animals and fear at the intensity of the context where they are housed. <b>Claudelands animals in last weekend's event arrived early afternoon, spent most of that time up until event end, penned inside the rear part of the arena. If they weren't there...they were on a stock truck. They had traveled a long distance there and no doubt the return journey equally arduous.</b> NZARC has garnered over 11,000 signatures in a petition calling to halt not only all rodeo in NZ and specifically Hamilton's shameful Claudelands Rodeo.	Noted
	24	I have found that most New Zealanders are ignorant that this event even goes on still, they think it is just a horse riding event like country showjumping....it is this ignorance by a wider and more ethically turned on public, along with an out of date legislation...which allows this horror story for animals to continue despite so many efforts by a wide range of people - lawyers, academics, business people. In fact, I have never met an intelligent person who was pro rodeo, it seems to be the pastime of the poorly educated country school drop out.	Noted
	7	I have been involved with the Rodeo Code since the very first Voluntary Code was produced prior to the 1993 Code, in 1983 I had several discussions with REDACTED regarding the Welfare of Rodeo Animals. When the Animal Welfare Codes were initially proposed I was involved in discussing the format and indeed content of the initial Voluntary Code and the 1993 and 2003 Code Reviews.  After more than 30 years experience first hand with the Rodeo Code I can confidently say that the Code for Rodeo Animals has proven to withstand the changes within the sport and covers all aspects of the Animals and their wellbeing within it. That the changes to the previous 2003 code were minimal bears testimony to the original process and it is very similar with this review where I think most changes will relate to terminology and interpretation.	Noted

		<p>Thirty years after the original Code and 32 years after the Voluntary Code for Rodeo the major Rodeo Authority remains the NZRCA which is stable at some 35 Rodeos, 1200 active Members participating/producing Rodeos and an annual attendance of some 200,000 or so spectators.</p> <p>Before I submit to the Draft, I would like to quote REDACTED.          “It is not disputed that rodeo individuals have a significant knowledge of the stock they use, or that the sport is serious and sincere about animal welfare. However, this form of common knowledge or rodeo lore, inherent in competitors and supporters, is rarely documented and therefore not fully recognised by those outside the sport.”</p>	
	26	<p>I would ask that you consider the following when reviewing the <i>Welfare Code for Rodeos</i>:</p> <ul style="list-style-type: none"> <li>• The link between animal abuse and violence in our community</li> <li>• Rodeos expose children to sanctioned animal abuse. Violence begets violence. Children who attend rodeos witness riders and ropers dominate and injure animals. These children see that the most violent offenders often win the biggest prizes. (Please see psychology commentary attached).</li> <li>• The outlawing of rodeos in Auckland and other cities around the world should serve as a signal to you that this is just not the cry of animal activists</li> <li>• The call from animal behaviourists and veterinarian experts to ban rodeos</li> <li>• The hypocrisy of a country that abhors violence towards people and companion animals yet draws the line at farm animals.</li> <li>• MPI has in recent years, conceded that factory farming and animals in circuses are cruel so in the interests of consistency the same should be said of rodeos</li> <li>• Rodeos making a mockery of the farming industry’s claim that they care about the welfare of animals</li> <li>• Rodeos are not a necessity of NZ life and add no value</li> </ul>	Noted
	26	<p>Media, local councils and corporate marketing departments align themselves with rodeo through sponsorship in order to profit themselves - making rodeos legitimate entertainment in the public’s</p>	Noted

		eyes. I note also that just like with greyhound racing, rodeos like to ride on the coat-tails of highly respected charities in order deceive the public into thinking their form of entertainment is harmless fun.	
	26	We seem to be catering for the entertainment whims of a very small segment of our society. The International Rodeo promoter has used school children by giving away hundreds of tickets for the recent Dunedin and Hamilton indoor event in order to bolster seat numbers. When a show has to stoop to such desperate measure it proves that rodeos are dying out. Indeed, I am certain its existence will eventually be looked back on in disbelief in the future by future generations.	Noted
	29	There are a variety of views on rodeos within the NZVA, from those who are philosophically and ethically opposed to using animals in this way to those who, as providers of veterinary services to such events, are comfortable with the level of care provided to the animals. This submission is based on the premise that if rodeos are to continue, the welfare of the animals is paramount.	Noted
<b>Questions</b>			
Question 1	15	<p>We consider a code of welfare for rodeos necessary, but futile, if this barbaric 'sport' is allowed to continue. The government has neither the inclination nor the resources to enforce the minimum standards set out in the proposed code. It is simply unrealistic to expect a government employee to attend rodeos to measure the length of spur rowels and to enforce the other minutiae of the code, particularly when other important social goals are being unmet because of financial restraints brought on by the current recession. And with an already-burdened police and court system, it is highly unlikely that violations of the code would be treated with the severity they deserve.</p> <p>Allowing the industry to self-police is even more ridiculous; having a rodeo organizer appoint his own 'animal welfare officer', as set out in the code, is a classic example of the fox guarding the chicken house. What incentive would this person have to stop or prevent animal abuse when he answers to the</p>	Noted

		rodeo organizer himself? Only the presence of an objective veterinarian who attends the entire rodeo would provide the minimal protections spelled out in the code.	
	19	Since it is our contention that rodeos in their present form are unlawful, a code of welfare for rodeos is not only unnecessary but counterproductive. The title of the draft code should be changed to “horse-riding events” to reflect this.	Noted
	29	The NZVA considers it essential to have standards around this use of animals. The use of animals in sporting events could be seen in effect as non-essential, and as such, particularly where there is potential for stress and injury to the animals, the safeguards to animal welfare provided by a code of welfare are especially important. There is certainly a degree of societal concern about the use of animals in rodeos, and having strict requirements in place may allay some of this, although not the concerns of those philosophically opposed.	Noted
Question 2	15	The code is assuredly the <i>very least</i> that can be done to regulate an industry that has no place in modern New Zealand. I do not believe that the standards in the code will ensure that the physical, health, and behavioral needs of animals used in rodeos will be met for the reasons stated above. However, imposing a complete ban on torture devices such as spurs, flank straps, and electric prods would go a long way towards reaching that goal. The same is true of adopting severe penalties for violations, requiring a veterinarian to be present at all times at rodeos, and including in the code a simple method for the public to lodge complaints which will be acted upon by animal welfare officers and enforced by the courts.	Noted
	19	As SUFA have pointed out in their previous submission on the Animal Welfare Act (also see Morris 2006, 2009, 2012), Codes of Welfare have always been biased in favour of industry groups. The present draft code is therefore likely to have been strongly influenced by the NZRCA and have minimal provision for looking after the welfare of the horses. The codes of welfare and minimum standards are therefore not satisfactory, and in their place SUFA recommend a ban on most rodeo practices as described above, and for the reasons given above.	Noted

	29	<i>In general, yes, except where specified by the NZVA submission.</i>	Noted
Question 3	15	The example indicators appear to be appropriate to describe how to measure or assess the achievement of the intended outcome of the minimum standards. However, I think those indicators should be incorporated into the minimum standards.	Noted
	19	We would like to see example indicators being made into minimum standards, except where they refer to practices that should not be allowed.	Noted
	29	<i>In general, yes, except where specified by the NZVA submission.</i>	Noted
Question 4	15	The recommendations for best practice should also be incorporated into the minimum standards.	Noted
	19	See answer to question 2 (i.e Submitted 19 on Qn 2)	Noted
	29	<i>In general, yes, except where specified by the NZVA submission.</i>	
Question 5	15	I would hope that this code would improve existing arrangements for the management of animals used in rodeos. However, the only way to ensure those animals are protected is by banning their use in rodeo events such as bronc and bull riding, and calf-roping.	Noted
	19	The code as written would continue to allow animals in rodeos to suffer. If our provisions are adopted, then animals that are not used to being ridden will be left in peace, cows and calves will not be injured by being thrown on their backs in roping events, and horses would be managed in a more humane and respectful manner.	Noted
	29	Very little change in its current draft, although some changes are suggested and explained in the NZVA submission	Noted
Question 6	15	This question seems to reflect a greater concern for the profits of rodeo operators than the welfare of	Noted

		the animals whose abuse is the source of those profits. What about the concern of the general public with animal cruelty, or about New Zealand's international reputation as a country (and tourist destination) that condones animal abuse?	
	19	In its 2012 discussion document on proposed changes to the Animal Welfare Act <sup>6</sup> the Ministry for Primary Industries stated that “it matters how animals are treated – it matters to the animal and it matters to us”. It certainly matters to all of us at SUFA how animals are treated, and knowing that the country we are part of continues to abuse animals for so-called “entertainment” is an on-going emotional cost.	Noted
	29	No	Noted
Question 7	15	I see many barriers to the implementation of the proposed code, some of which are set out above. In addition, in my experience of American rodeos, their operators create and foster an image as 'cowboys', 'renegades', 'mavericks', and 'outlaws' who typically scoff at concerns about animal abuse and pride themselves on living outside the law. Unless this code has real teeth in it and staff designated to enforce it, I think it will just be another example of meaningless government regulation. Rogue rodeo operators will continue with business as usual, people who are concerned about animal welfare won't attend rodeos and report on what occurs at them, and animals will continue to suffer. The only way to resolve these problems is by banning the use of animals in rodeos.	Noted
	19	If our submission is accepted, then the NZRCA will no doubt lobby fiercely and threaten all sorts of dire economic and cultural consequences, in the same way that other industry groups have done when threatened with any regulation of their abusive practices (Morris 2006, 2009, 2012). The government should ignore such posturing, and must concentrate on its mandate of protecting animals, and complying with the sensibilities of the public. As we have stated before <sup>7</sup> , it is not a function of government to continue to prop up inefficient or unethical businesses that cannot or will not comply	Noted

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		with what the law demands and what the public finds acceptable.	
	29	<i>The NZVA is aware that not all rodeo events are under the auspices of recognised groups such as the New Zealand Rodeo Cowboys Association (NZRCA) or the Bull Riders Association. Those controlling smaller events at, for example, local A&amp;P shows are likely to have less awareness of codes of welfare in general, and this code specifically. Such events outside the NZRCA and BRA should be identified and specifically targeted to ensure full awareness of the requirements of the code.</i>	Noted
Question 8	15	Presumably having a rodeo code of welfare demonstrates some nominal concern about animal welfare, but banning the use of animals in rodeos altogether would promote New Zealand to the rest of the world as a civilized country concerned about animal cruelty.	Noted
		<p>If our submission is adopted, the animals would benefit directly. Cows and sheep would be left in peace, cows will not be injured by being thrown onto their backs at speed, and horses will not be injured by spurs, prods, goads, whips and straps, or stressed by loud noises. The New Zealand public, most of whom oppose animal cruelty, would also benefit. Rodeos are already banned in New Zealand's largest city, and the entire Auckland region. So they are not something most New Zealanders particularly want.</p> <p>Banning rodeos in their current form would also send a message to our international trading partners that we take animal welfare seriously, and this could well be beneficial to our international trade. Given that the MPI sees animal welfare more as a market access issue than one of genuine compassion towards animals<sup>8</sup>, then there are good economic arguments for banning events such as rodeos that contribute very little economically.</p> <p>Interestingly, rodeos are being banned in a number of jurisdictions world-wide, including the entire United Kingdom, the Australian Combined Territories and many cities in the Western United States,</p>	Noted

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		the area they originated from. Other places have not banned rodeos outright, but have placed restrictions on some of the more inhumane practices such as cow roping and the use of electric prods <sup>9</sup> . International trading partners may therefore see the determination of the New Zealand government to continue to allow rodeos as a retrograde step, and our reputation may suffer accordingly.	
	29	<i>It is absolutely essential to have minimum standards and recommended best practice to ensure the welfare of these animals. As mentioned previously, the degree of societal concern about rodeos requires high standards and appropriate oversight to be implemented if these events are to continue.</i>	Noted
Question 9	15	As the SPCA points out, rodeos foster a cavalier attitude about the treatment of living creatures, something which presumably New Zealand does not want to foster, especially among children who often attend and participate in rodeo events. A country plagued with child abuse must take a careful look at itself and find ways to root out the causes of that violence. It should also consider the numerous studies linking childhood cruelty towards animals with violence in adult life. If children are allowed to watch animals being gratuitously abused for public entertainment, what type of adults will they grow up to be? If it is okay to spur, whip, prod, and aggravate an animal, what is wrong with teasing, tormenting, and injuring a fellow human being?	Noted
	19	Economic benefits have been discussed above.  Adopting our policies would have a beneficial effect on New Zealand's reputation. It will be a perfect opportunity for the government to not only state that it "is acknowledged internationally for having a world class animal welfare system <sup>10</sup> ", but to prove it. When regulations are changed in line with public sensibilities and with the actual intent of the law, this increases respect for the law, which can only be a good thing. In addition, a ban on events reinforcing the macho notion that might makes right, and that it is quite acceptable to exert dominance weaker beings just because you can, would certainly improve New Zealand society and morals overall.	Noted

		The submitter has also included a list of his own publications.	
	29	There will continue to be opposition to rodeos and these events will continue to draw criticism no matter what standards are in place.	Noted