

**Animal Welfare (Transport within New Zealand) Code of Welfare.
Summary of Submissions from Public Consultation. 16 October – 30 November 2009**

Section	Sub No.	Comment	NAWAC Response
1. Introduction			
	20	The terms 'journey' and 'animal' should be defined in the introduction. The use of the term 'animal' in the code should be borne in mind as the use of the term makes some details ambiguous.	Agree. Addressed. And in glossary.
	24	As this is the first draft code of welfare to include example indicators, this is likely to cause some confusion. We suggest including a paragraph or so in section 1 that addresses the role of example indicators explicitly.	Disagree.
	21	1st para – second sentence – does not reflect the purpose of the code as covered in the Animal Welfare Act. It should be amended to read 'The purpose of this code is to establish minimum standards and to include recommendations on best practice in order for the owners of pigs and persons who are in charge of them to meet their obligations under the animal welfare act, 1999.	Amended to align with other codes.
	16	2nd para – Thinks that these definitions need to stand out more, so that they are clearer to understand. Doesn't think that example indicators are useful as they just repeat the MS or just state the obvious outcome if the MS is not met, they don't always relate to the MS or they contradict previous information and in other cases provide insufficient information.	Noted.
	21	3rd para – 1 st sentence – change 'expected' to 'recommended', because section 10 includes RBP.	Agree. Code clarified.
	16	4th para – last sentence – what does this mean? What does 'long' mean in this instance. Could it be confused with exporting 'long' distances?	Agree. Deleted.
	16	Final para – add website details to the end of this para.	Agree. Added.
2/2.1 Responsibilities			
	21	1st para, 3rd sentence – Hard to understand meaning. This could be left out.	Agree. Deleted.
	24	1st para, 4th sentence – unclear and does not add substantially to the message of the introduction. Recommend removing this.	Agree. Deleted.
	18	Bullets: in this section are all good practice or advice, but they read like actual requirements.	Agree. Section updated.
	20	Bullet No. 4 - Washing of the transport conveyances needs to be defined such as intervals between washing or between animals from different sources or different species. Alternatively reference should be made to the appropriate species code.	Noted. Section amended.
	18	Bulletpoint No. 4 – Many 'facilities' such as farms are unable to provide such facilities.	Noted. This is guidance only. Code clarified.
2.2 Competency			
	7	Intro - A regulated control scheme under the Animal Product Act (1999) is currently being developed and implemented,	Noted.

		whereby all NZ operators transporting animal products would need to have the risk management programme officially approved by NZFSA. Unfortunately, none of the live animal transporters are required to be approved.	
	24	Intro – The statement ‘competence in areas other than animal welfare needs to be addressed separately’ would be improved by adding an example. (e.g. driving skills).	Noted. This comment deleted as not relevant to animal welfare.
	7, 11	MS1 This MS should be more prescriptive	Agree. Text amended.
	19	MS1 – The terms ‘Sufficient, appropriate ability and knowledge should be defined. For NZ to reach the required ability, a national training scheme must be performed. All personnel transporting animals should be aware of and understand the legislation and codes pertaining to animal welfare. Suggest this MS is changed to read ‘At every stage of transport, animals must be cared for by a minimum of xxx personnel, who individually possess the appropriate ability, knowledge and competence (having demonstrated through an appropriate certificate from an independent and formally recognized training or professional development body which includes understanding of legislation and codes) necessary to maintain the health and welfare of the animals in accordance with the code.	Agree. Edited.
	27	MS1. ‘Competency’ can be defined as ‘having sufficient skill, knowledge, ability or qualifications’ – therefore use of words ‘ability’ and ‘knowledge’ is redundant. As also is the word ‘appropriate’. Recommend that this be reworded to read ‘At every stage... personnel who possess the competence necessary.’	Noted. Competency = ability to undertake a task well (ie skill).
	11	MS1. No. of personnel should be defined. Where and how is competency defined? Suggest this should also based on the distance travelled.	Agree. Clarified in code.
	27	MS1 – example indicators – the example indicators provided for this standard are inappropriate. Bulletpoint 1) – simply restating the purpose of the code – not related to MS, 2) – so vague as to be of little use, 3) – documented evidence in 8 areas is onerous and it is difficult to determine what the requirements are. In addition, the examples provided are not internally consistent. This section can be simplified to read ‘Appropriate procedures and evidence of the training and competency of personnel shall be documented’.	Agree. Text clarified.
	20	MS1 – example indicators – first bulletpoint – add ‘or where applicable, relevant species codes’	Agree. Text amended.
	20	MS1 – example indicators – second bulletpoint – ‘code applies to all animals including pets, how will this apply?’	Agree. Clarified.
	24	MS1 – example indicators – third bulletpoint, and all its sub points are not clear. Could be re-worded to read ‘to be able to accept the responsibility for animals during the journey...’ – and state what staff should be able to do.	Clarified.
	20	MS1 – example indicators – 4th bulletpoint – Should be ‘ensuring’ not ‘assuring’ and add details of any veterinary certification required	Agree. Amended.
	20	RBPs – Training should be compulsory for stock handling staff, otherwise the animals should be accompanied by a person who has relevant animal handling and welfare experience.	Noted. This is an RBP only. Text amended.
	21	RBP (a) – Change ‘Quality management or assurance schemes’ to ‘welfare assurance’. This better links in with the comment in 2.2 (Intro, 1 st para, 3 rd sentence)	Agree. Amended.
	7, 10, 13	RBP (b). All commercial operators should be formally trained and transport conveyances officially approved by the appropriate animal welfare authority. Those responsible should be regularly trained and kept up to date with advances in welfare and husbandry.	Noted. Inappropriate for animal welfare authority to do this. Covered in Animal

			Welfare Assurance section of code.
	18	RBP (b). There is a need for an alternative recognition as there are a number of independent contract trainers with excellent animal welfare experience that are suitable, but do not meet this criteria.	Agree. Amended.
	10	RBP (b). Requiring certification for all operators that transport animals is not feasible. There may need to be therefore a statement covering who exactly is responsible for the non-commercial transport of animals eg. Farmers transporting stock, breeders taking animals to shows, dog owners attending competitions etc	Agree. "Commercial" now specified.
	18	GI. Inclusion of specific training providers in the code is inappropriate as it gives a commercial advantage.	Noted. Further sources now specified.
3/3.1 Equipment/ Conveyance			
	20, 27	Intro – 2 nd para – give references, and to what species does this apply?	Clarified.
	20	Intro – 3 rd para – reference IATA regulations as minimum standard	Noted. Section edited.
	16	Intro. 4 th para. Line 1. To remove any semblance of anthropomorphism, change first sentence to 'In general, animals, particularly domestic pets, experience less stress if they are transported in semi-darkness.	Noted. Section edited.
	20	Intro – 4 th para - Do all animals like semi-darkness?	Noted. Section edited.
	24	Intro – 4 th para – this para may fit better under RBP.	Noted. Section edited.
	28	MS2 – The current format does not address the internal ramps and design of doors with regards to welfare. There are currently a few commercial QA programmes that do take these into consideration. The best practice should include a QA program that have specs for the floor, ventilation, internal doors, internal loading ramps and drainage, combined with written procedures required on how these standards are going to be met and including verification of these standards.	Noted. NAWAC is encouraging QA schemes to address welfare. MS is outcome-based.
	27	MS2 – The use of the term 'conveyance' can mean cars, tractors, farm-bikes etc and the transport of animals on farm bikes isn't going to meet requirements such as travelling animals in crates and securing them to the conveyance. The 8 parts of the MS contain some redundancies and overlap with the example indicators. The large no. of example indicators is unnecessary. Suggest MS be reworded to read: a. Conveyances and containers used must be designed and constructed to ensure the safe transport of all animals. All conveyances and containers used to transport animals must be appropriate for the animal species involved and where relevant, the terrain, the distance to be covered, environmental conditions and the physical state of the animal (s)'	Agree. Clarified.
	20	MS2 a) – Where are these details available – and which species are covered?	Agree. Clarified.
	24	MS2 a) – Vague – possibly would be better served by addressing specific elements such as is achieved in points e) and f).	Agree. Clarified.
	X	MS2 (d). Add – conveyances should be maintained in good mechanical and structural condition. This should be a MS, not a RBP, and as such, should be deleted from RBP (a)	Agree in principle, but not animal welfare. Concept incorporated into (a)
	18	MS2 (e) – 'must be designed AND MAINTAINED so as to ensure...	Agree. Amended.
	19	MS2 f) – there has been debate in Australia as to what 'natural posture' means. The intent of those arguing for the least	Not appropriate for all

		height allowable was that sheep stand with their head down, therefore so long as the height of the crate allows the sheep to stand with its back to the roof, it is permissible. To be able to 'prove' suffering in this case would be difficult. Therefore clarification of this term is warranted. Change MS2 to read 'Crates and containers must be designed so as to ensure enough room overhead to enable animals to stand in a natural posture:(that is with their head fully extended above their body) without touching the overhead structure.	species. Proof is injury. Code amended to cover all species.
	13	MS2 (f) . Add – all animals except poultry should be able to stand, and poultry should be able to sit, with the head in a comfortable position.	Too specific for this code. Code amended to cover all species.
	18, 24	MS2 (f) – Delete 'to ensure enough room overhead' - as requirement needs to be broader than height. Recommend that a definition be added for natural posture.	Agree. Deleted.
	16	MS2 (f) – Note that the IATA regulations actually state a minimum clear distance above the animals head to ensure adequate ventilation flow. Very concerning to see no space available in multi-decked sheep trucks.	Noted.
	19	MS2 g) – Clarification of 'adequate ventilation' and 'free flow of air' is required. Submission 19 provides a longer suggested MS for MS2 g).	Agree that clarification is needed. Text clarified.
	20	MS2 (j) – Does this include cats in cat baskets in cars or boxes of laboratory animals?	Yes it does. Text clarified.
	13	MS2 . Add (k) – Design of the containers should allow for emergency access.	Noted. General information item added.
	18	MS2 – example indicators – Bullet No1. – delete 'normal' add 'a natural' instead.	Agree. Now aligned with MS.
	16	MS2 – example indicators – Bullet No1 – should be an MS.	Noted. MS clarified.
	20	MS2 – example indicators – Bullet no 7 – dogs in boxes at road level in stock trucks must be dealt with effectively as they are subjected to toxic fumes from other vehicles, this practice should be outlawed.	Noted. Dog boxes are required to have sufficient ventilation so that their welfare is not at risk from such fumes.
	24	MS2 – example indicators – Bullet no 10 – will be very hard to ensure absolutely no injuries. It can also be difficult to assign a defective cause to an injury, because the injury likely occurred unseen during a trip.	Noted, but this is considered minimum necessary to meet purposes of the Act (ie to avoid pain or injury that is avoidable).
	16, 27	MS2 – example indicators – the large no of indicators here is unnecessary. Many are worded in the negative (ie no signs of distress), which can be seen as difficult to prove. Also indicators can be grouped into separate categories here (e.g. injuries, posture/balance etc). This section can be simplified to read 'All injuries or distress attributable to the	Noted. Many indicators now edited.

		conveyance of animals outside the bounds of accepted current practice are to be documented and investigated’.	
	24	RBP a) and i) – already covered in MS2. Suggest rearranging the points so that the ones relating to ventilations are all together.	Agree. Text rearranged.
	20	RBP a-f) – does not address the dog left in the car, control of water temperature for aquatic species and amphibians or specific requirements of various other species covered by this proposed legislation.	Noted. These RBPs relate to design and maintenance only.
	27	RBP – b) Changed to read ‘Any mechanical ventilation system should be capable...	Noted. Text clarified to reflect proper intent of this RBP.
	27	RBP c) – The second ‘conveyance’ is redundant and should be removed.	n/a. Now deleted.
	20	RBP h) – What about nude, naked or hairless animals, then transportation would be inappropriate in cold weather without specific climatic controls?	Now addressed in travel section.
	21	RBP h) – could be reworded to reflect that during some seasons in some parts of NZ, the weather is very hot and ventilation is critical.	Now addressed in travel section.
	27	RBP h) – suggest reword to read ‘Transportation of animals in stress inducing weather conditions should be avoided where possible, unless such stress can be mitigated’.	Now addressed in travel section.
	20	RBP j) – this is specific for stock animals, not equids or other species where shock absorbent floors are preferred.	n/a. Now part of MS.
	18	RBP (b) – Original statement is prescriptive. Replace with ‘Adequate ventilation should be provided throughout the conveyance’.	Deleted. Adequately covered in MS.
	11	RBP (c). What is the definition of ‘adequate facilities’ and how is this to be met, per species?	Clarified.
	8	RBP (e). Advice relating to emissions is not related to animal welfare and should be removed from the Code.	Disagree. Emissions affect animal welfare.
	8	RBP (f). Provides information on exhaust placement. This is unnecessary as it is covered elsewhere within road transport literature and is therefore unnecessary. The placements of exhausts as suggested in (f), depending on the vehicle configuration, may not be the best place for exhaust systems to be mounted.	Agree. Now outcome-based.
	X,	RBP (h). This will be difficult to both regulate and police. Could specify conditions relating to animal type.	Now shifted to ventilation and clarified.
	X, 25	GI – para 2 – Delete ‘suitable bedding may be added to crate or container floors’. Replace with ‘For some species it may be appropriate to add bedding, where necessary and practical...’	Disagree. But text amended.
	7	The existing national standard for the design, manufacture and use of stock crates on heavy vehicles is outdated and of limited value for the design and manufacture of new crates these days. Years of selective breeding in cattle has significantly increased the average size and many of these animals are unable to maintain posture in these old stock crates - many of them arrive at the slaughter premises with heavy bruising on their backs.	Noted.
	7	No separate standard for transport conveyances for bobby calves exists and modified sheep or beef crates are used for this purpose. As the commercial value of bobby calves is low, there is no incentive to improve their transport conditions. There are many losses of bobby calves associated with long transport in inappropriate conditions.	Noted.
	7	This section could be condensed by making reference to the standards and codes of practice from which comments have	Agree. Edited.

		been sourced instead of regurgitating information that is contained within other documents in the CoW.	
3.2 Loading and Unloading			
	20	This section is stock specific – for other species check IATA and equine codes.	Noted. Text amended.
	24	The title of this section should refer to assembly/holding yards.	Disagree.
	18	Intro – para 3. – Reword last para to ‘Because animals move more readily uphill than downhill, the greatest care should be exercised when moving animals downhill e.g. particularly ramps. The slope of any ramp should be minimized as much as possible.	Agree in principle. Text amended/deleted.
	24, 16	Intro – para 3. Last sentence is nonsensical as this would mean very lengthy loading ramps. We suggest that it is replaced with ‘steep downward slopes should be avoided wherever possible’.	See above.
	8	Intro – para 3. If ramp slopes downwards, the slope needs to be as flat as possible’. States that this suggestion is nonsense – see submission 8 for full explanation.	See above.
	21	MS3 – It is recognized that loaded and unloading can be potentially v. stressful for pigs. Pigs can vary in their response to stress, often for no clear reason. Stockmanship is crucial and submitted suggest that training in this area is given more emphasis within the example indicators listed for MS 1, Particularly for unloading at the slaughter plant.	Noted. This MS related to facilities not processes.
	8	MS3. Should be supported by references to relevant documents to provide loading and unloading operators with the information required.	Text now amended. To check with RTFNZ.
	27	MS3. The number of component parts in this MS is unnecessary. Problems include duplication (e.g. no hazards, sharp objects, likely to cause injury etc).	Noted. Text now edited.
	27	MS3 – Recommend that this information be included in the section on loading and unloading.	Noted. Cross-referenced elsewhere.
	27	MS3 – This MS should be rewritten as a. Loading and unloading facilities must provide for the safe movement of animals on to and off conveyances. b. Where necessary, the facilities must include the provision of shelter from environmental conditions that would place the animals under severe stress’.	Agree this needs clarifying and simplifying. Text now amended.
	18	MS3 a) Reword to ‘Loading and unloading facilities including all fittings and internal surfaces must be constructed and maintained to ensure that there are no hazards likely to cause injury to animals. Delete MS3 b).	Agree. Text amended.
	19	MS3 d). Add ‘In the event of a gap between ramp and conveyance, rubber seals or cushions must be used’.	Noted, but too specific for MS.
	27	MS3 d) – ‘Close’ means ‘near’, ‘approximation’ means ‘very near’ and so the use of ‘close approximation’ is unnecessary. Further ‘nearness’ is not an absolute term and so not appropriate for a MS.	Agree. Amended.
	16	MS3 (d) – This is a bit clumsily written. Suggest something like ‘Facilities must be constructed so as to allow close alignment of vehicle and loading ramp’.	As above.
	8,10, 18	MS3 (e). The species and circumstance will dictate the level of shelter and shade that can be provided to animals while awaiting loading and unloading. This MS is too vague. Suggest it becomes a RBP.	This is the intention of the MS. It is considered to the

			minimum necessary to meet purposes of the Act, according to the species, environment and circumstances, as the Act requires.
	20	MS3 (e) – will require that most sale yards will have to undergo extensive changes to meet this MS.	This MS applies to unloading facilities, not the holding of animals at saleyards.
	19	MS3 (e) – Define appropriate to the species and circumstances. Believe that clear direction is required.	Agree clarification required, but note that the Act defines needs in terms of appropriateness to species, environment and circumstance of the animal.
	19	MS3 e) Regardless of species and circumstances, animals require shelter and shade, and the provisions of which should not be decided upon the perception of the person involved’	Noted. Comment as above.
	19	MS3 f) – suggest add MS which reads ‘Lighting must be provided to ensure that every part of the loading/unloading operation is visible. Facilities must provide uniform lighting directly over approaches to sorting pens, chutes and loading ramps, with brighter lighting inside conveyances or containers, in order to minimize baulking and prevent accidents’. It is common to load or unload at night; therefore to ensure welfare requirements are met, lighting is essential.	Noted but consider not minimum necessary to meet purposes of the Act.
	19	MS3 g) – suggest add MS which reads ‘Under warm and humid conditions, ventilation should allow for the adequate convective cooling of each animal’. In some circumstances, adequate ventilation can be achieved by increasing the space allowance for animals. Again to ensure welfare requirements are met and to avoid stress and distress, free flow of air should be mandatory. The density of animals should always be made with consideration given to airflow; therefore this must for part of the minimum standards. Provisions must be made for water to be available to all animals.	Now addressed under ventilation.
	27	MS3. Example Indicators – 1st bullet – this is a restatement of the standard and is unnecessary.	Noted.
	7	MS3. Example Indicators – 2 nd bullet - Proposed indicator for this MS is unrealistic. Slopes on the majority of all loading ramps for all species, with the exception of some bobby claws, are in excess of 20 degrees.	Agree. Amended so that applicable to all species.
	16	MS3 Example Indicators – 2 nd bulletpoint and RBP (d) – (and last sentence of introduction) – suggested that differentiation is made here between the degree of incline for uphill and downhill ramps.	See above.
	27	MS3 Example Indicators – 2 nd bulletpoint – this is impractical – ramps would have to be very long.	See above.
	18	MS3 Example indicators – 2 nd bulletpoint – change to ‘The design and slope of ramps be such as to minimize animals becoming distressed, injured or slipping. Delete current bulletpoint.	Agree. Text amended.

	20, 21	MS3 Example indicators – 2 nd bulletpoint – ramp slope not correct for all spp. Sheep, cattle, pigs, goats will climb steeper slopes in decked transport. Horse boxes are generally much steeper.	Agree. See above.
	27	MS3 Example indicators – 3 rd bulletpoint – it is unclear how, without human intervention, the design and construction of the facility will provide this outcome.	Noted.
	27	MS3 Example indicators – 4 th , 5 th and 6 th bulletpoint – refer to absence of effects – these phrasings are very difficult to prove.	Noted. Text to be amended.
	20	MS3 Example indicators – 5 th bulletpoint – not absence, this is unrealistic as animals suffer some form of stress as soon as something in the environment changes.	Noted.
	18	Example indicators – 6 th bulletpoint – reword to ‘Absence of gaps that might allow body parts (e.g. heads, legs) to become stuck, cause injury or allow escape....’	Agree. Amended.
	27	Example indicators – these can be rewritten as ‘All injuries or distress attributable to the loading and unloading of animals and outside the bounds of accepted current practice are to be documented and investigated’	Agree in principle. Text amended.
	20	RBP and GI – specific for stock – no recommendations for pigs or other spp. Pig transport was well covered in old code, but not in this one.	Noted. It is intended that general principles in this code apply to all animals. Species-specific guidance can be built into QA schemes.
	27	RBP c) – Simplify to read ‘All ramps and the floors of all pens should incorporate a non-slip material to aid grip’.	Agree.
	18, 27, 16	RBP c) – delete - restatement of a)	Agree. Deleted.
	27	RBP d) – Simplify to read ‘Ramps should be constructed to minimize stress and the risk of injury. Design parameters should be benchmarked against current industry practice’	Noted. Addressed in MS.
	27	RBP e) – Simplify to read ‘If necessary, artificial lighting should be provided to promote movement of animals onto conveyances’	Noted. Suggestion is less than current RBP which refers to provision of light, brighter light inside conveyances/containers, and uniformity of light.
	18	RBP f) – Provision should be made for water to be available for all animals before loading and after unloading.	Agree. Text clarified.
	24	RBP f) – uncertain as to whether this is relevant to loading/unloading facilities. If so – clarify.	See above.
	27	RBP f) – Simplify to read ‘The design of facilities should incorporate ventilations requirements’.	Noted.
	18	RBP g) – Add new RBP – ‘Animals should be provided with shelter and shade while awaiting loading or following unloading, appropriate to the species and the circumstances’.	Addressed in MS.

	24	RBP g - point needs clarification as it is not practical to offer water within loading facilities where aim is to get animals moving, not stopping to drink water. If the point refers to holding yards, then that should be specified.	Agree. Clarified.
	27	RBP g – Simplify to read ‘Water should be available in (un)loading facilities’	See above.
	19	RBP e), f) and g) must be included in the minimum standards.	Noted.
	20	RBP g – How often should water be provided and where? Should specify that it should be available until loading.	See response to 27 above.
	20	GI – para 3 should be referenced to specific welfare codes and written as specific regulations for MS’s for other species such as pigs and bobby calves.	Agree. This is being progressed gradually through species-specific codes of welfare.
	24	GI – most of this is a requirement of the act, and so doesn’t need to be restated. If it is left in, then the last sentence should be changed to read ‘all calves’ (not just bobby calves).	Agree. Amended.
4.The Journey			
	20	Include the definition of ‘journey’ in this section.	Agree. Defined in the glossary.
4.1 Planning			
	27	First para – A plan is not always needed and this should be reworded to read ‘As needed, the plan should include.’	Noted, but consider that planning has the advantages listed so should remain as is.
	16	Second para – Would be useful to describe what sorts of documentation are around.	Noted. This refers to all required documentation.
	8	Second para - Referring to para ‘to ensure that standards of animal welfare and husbandry are maintained during transportation it is important that all documentation required be complete and accurate’. States that transporter should receive and forward necessary documentation but should not be responsible for ensuring that the documentation supplied to them is correct. That is the consignor’s role.	This was not intended. Edited for clarity.
	27	MS4 – Fed farmers does not believe that a MS for documentation is required for animal transport and wants it removed from the code. a) Incorrectly assumes a causal relationship between the provision of documentation and trip time, but in reality there could be a number of reasons why a trip may be delayed that have nothing to do with documentation. This document also provides no guidance as to which documentation must be completed and accessible, e.g. transport operators may need to carry a completed animal status declaration and should this not be present, there is potential for animal welfare issues to develop around resulting delays.	Noted. This code is intended to address all avoidable delays, not just those caused by documentation. NAWAC considers that all those consigning, transporting or accepting animals

			need to know and attend to their own documentation requirements.
	18	MS4 a). As the standard is written, documents such as ASD's must be available to meat processors prior to embarking on the journey. This is not practical, Recommend that the requirement is reworded and becomes a RBP.	MS now reworded.
	19	MS4 a) – Include definition of 'necessary'. Suggest change to 'All documentation including time off water, collection time from farm, change of transport, and vet certificates required to ensure that animals are able to reach their destination without delays must be completed and accessible to the relevant personnel prior to embarking on the journey'.	MS now reworded.
	27	MS4 b) – In addition to being vaguely worded, this repeats the second statement contained in a).	Noted.
	18	MS4 b) -Operators or agents holding details of animals does not impact on animal welfare. Also the term 'details' is non-specific. Recommend that this standard is deleted.	MS clarified.
	16, 18	MS4. Example Indicators. Change 'are in possession of' for 'are accompanied by'	Now changed.
	21	MS4 Example indicators – 3 rd bulletpoint – Note that NZPork is developing a QA approach to differentiate 'defective' pigs within a range of conditions, where neither animal welfare not human consumption suitability is compromised, that are acceptable to be transported to slaughter without a vet certificate. This work is progressing in consultation with the Pig Veterinary Society (of the NZVA), NZVA and NZFSA VA.	Noted. The Act's fit-for-travel requirements apply regardless of any categories that operators apply to animals.
	24	MS4 Example indicators – 3 rd bulletpoint – Should make reference to vet cert for special circumstances (e.g. low BCS). Also are not sure what is meant by point 5 – clarify.	Now changed.
	18	RBP. Add a RBP reading 'All necessary documentation should be accessible to the relevant personnel prior to embarking on the journey, to ensure that animals reach their destination without delays.	This is MS.
	18	GI. Delete words 'particularly', 'on' and 'for longer journeys' and 'of duration of more than 12 hours'.	Now changed.
4.1.1 Contingency Planning			
	20	This section is stock specific.	Now changed.
	20	Contingency planning for pet spp?	Now changed.
	27	Intro – second sentence is unnecessary and should be reworded as 'Consideration needs to be given to the provision of the relevant needs covered in this document in the event of unforeseen events'	N/a. New MS.
	27	MS5 – This MS has 4 parts, 3 of which the fed farmers believe are unnecessary. a) should be reworded to read 'Persons in charge of animals on a journey must mitigate and risk(s) around delays during transport that would result in significant harm to the animals. Parts b), c) and d) should be deleted as they are prescriptive rather than outcome based and covered in a) as suggested above.	Agree. New MS.
	19	MS5 – Comment – please include shelter for animals. Add MS c) and d) – suggested c) 'Where journey has been delayed, the person in charge of the stock must take into account the length of time the animals have been in transit and make appropriate feeding and watering arrangements'. And d) Operators of conveyances must be briefed on and contingency plan in place, in advance of journeys.	The requirements for contingency plans to meet the needs of the animals in transport is

			included in MS4. Shelter addressed in MS3.
	16	MS5 a). ‘Consignors’ – does this include owners too?	Text clarified.
	16	MS5 a) How is a delay defined?	Noted. Changed to ‘any delay’.
	18	MS5 a). Delete the word ‘Consignors or’ and replace with ‘The’	Noted. Text now clarified.
	13	MS5 b) add – and contact details of police, veterinary and other relevant authorities.	Now n/a
	24	MS5 b) – should read ‘facilities that can be used in an emergency’ rather than ‘emergency holding facilities’ to avoid confusion.	Agree. Indicator amended.
	18	MS5 b). Delete this MS.	Now outcome-based MS.
	27	MS5 – Example indicators – this should be reworded to read ‘The existence of a suitable contingency plan that describes how delays during animal transport are to be managed. The plan will include, as necessary, provision for emergency holding facilities and other matters necessary to ensure the animals do not suffer significant harm as a result of delays during the transport operation.’	MS for contingency plans included in MS4.
	16	MS5 – Example indicators - 1 st point – reported to whom?	Amended.
	16	MS5 – Example indicators – 2nd point – Isn’t this the same as MS5 (b)?	n/a
	16	MS5 – Example indicators – 3rd point – meaningless. All MS are required to be met in any situation.	Noted.
	18	GI. Add – a simple contingency plan could be instructions for the driver to contact his transport manager for determining a course of action.	Agree. Text added.
4.2 Preparation and selection...			
	16	Intro – Note that this document talks about owners, persons in charge, consignors, their agents. Need to make sure that they are noted correctly throughout the document.	Agree. Text amended
	8	Intro - Preparation and Selection of Animals for the Journey ‘The operators of conveyances have a responsibility to accept for transport those animals that are fit for the intended journey’ and 4.2.2 Selecting Presenting and Accepting Animals for Transport – suggests that ‘Transport operators and their staff need to consider the fitness for transport of the animals they are to carry’. States that although transporters should intervene if they identify animals that are clearly not suitable for transport, no responsibility should be placed upon transporters for consignor’s indiscretions.	Noted. Text amended accordingly.
	21	Intro – 3rd sentence – add in ‘pigs’	Text amended.
4.2.1 Preparation of animals...			
	20	First para – change word ‘covering’ to ‘rugging’ or ‘application of covers.’	Text amended.
	19	MS6 – Clarification between ‘familiarised’ and ‘appropriately’ prepared. There is too much room for personal perception. There is a big difference between the MS’s and the RBP’s for this standard. MS should be more prescriptive.	Noted.
	20	MS6 – Calves that are fed in the morning, but then transport doesn’t arrive until later in the day – not practical – calves travel badly with a full gut.	This is minimum necessary to meet purposes of Act and is

			linked to time limits in other codes of welfare.
	27	MS6 a) – This should be changed to read ‘ Before... will need to be fed and watered...’	No change.
	19	MS6 a) Suggest change to ‘Before undertaking a journey during which the animals will be fed and watered, animals must be familiarized with the feed to be offered and the methods by which feed and water are given.	This is not a change.
	24	MS6 a) Should use wording ‘pre-conditioning to the new feed’	Noted. Consider current wording clearer.
	16	MS6 b) – What about MS to cover sufficient emptying out, preparation for long journeys e.g. pregnant animals, resting (appropriate to the spp.) before the journey.	Noted. Consider current outcome-based MS does this.
	27	MS6 b) A proviso should be added to the beginning of part b ‘To the extent that is practicable...’	Noted. This is considered minimum and the Act allows for some discretion in applying MSs.
	19	MS6 b) Suggest change to ‘Animals must be appropriately prepared for transport so as to avoid causing pain, distress or injury to themselves or other animals. This includes: ensuring that animals must be exposed to appropriate contact with humans and handling conditions (including methods of restraint) prior to transport to reduce their fearfulness and improve their approachability. Animals that are wild or unaccustomed to handling should be quietened down over a period of days before transport.’	Noted.
	24	MS6 b) – meaning of ‘appropriately prepared for transport’ is unclear.	Noted. Indicators intended to provide guidance.
	18	Example indicators – Bulletpoint 1 – delete ‘a maximum of’ replace with ‘within’.	Agree. Amended.
	24	Example indicators – Bulletpoint 1 – should refer to all calves, not just bobby calves.	Text amended.
	16	Example indicators – Bulletpoint 1 – it is not clear what this means. Does this mean that they should be fed up to 2 hours prior to transport. Is not sure how practical this is as farmers often don’t know when the bobby calf truck will arrive. Note that this point is also written differently further on.	Noted. This is agreed practice.
	18	Example indicators – Bulletpoint 2 – delete words ‘The front’ replace with ‘All’.	Agree. Amended.
	13	Example indicators - Bulletpoint 2 add ‘(although use of such conveyances or containers should be avoided if at all possible)’	Noted. However, this is indicator for MS.
	20	Example indicators – Bulletpoint 3 – protection of long horn tips (e.g. tennis balls) for long horned cattle or goats.	Noted. Not considered an MS. More guidance provided in general information.
	27	Example indicators – Bulletpoint 3 – delete	Noted. MS &

			indicators now amended.
	27	RBP and GI – these sections exemplify how wide ranging the scope of the code is with respect to the species covered. It would be surprising if all material was ‘best practice’ across all species. It may be appropriate to provide links here to specific animal species.	Noted. Reference to species-specific guidance now given.
	24	RBP a) and h) refer to the same concept. Combine into one point.	Agree. Amended.
	18	RBP c). Recommend that this be made a MS.	Agree. Amended.
	20	RBP c). Why removal of only front shoes – all four would be better? Unsuitable floors should be covered with an absorbent material – acts as shock absorber and makes floor non slip.	See above.
	16	RBP c). Says front shoes only in the indicators.	See above.
	13	RBP (c). Should be changed to read ‘Horses should not be transported in conveyances or containers which are not purpose built for horse transport, with a non slip surface. If it is absolutely necessary to transport them in a vehicle with a more slippery floor surface, all shoes should be removed prior to transportation.	Now covered in MS.
	14	RBP c). This should be changed to be an MS.	Now MS.
	20	RBP d) Submitter has provided recommendations for transport of mono-gastric species – e.g. small pets, dogs and cats – see submission 20 for further details. Has given recommendations in accordance with the IATA guidelines.	Noted.
	20	RBP d) – Food can be removed from pigs approx. 4 hours prior to travel to reduce motion sickness. Hay and water should be made available to horses until loading.	Noted.
	20	RBP d) – Horses needed to be rested from travel every 10 hours unless the whole journey is likely to last 12 hours or less. Water should be offered at regular intervals throughout the journey but not less often than every 8 hours.	See above. To be covered in horse code.
	21	RBP d) – More factors than motion sickness impact on the food withdrawal for pigs including length of journey and estimated total time off feed, plus practical issues to do with withdrawal of feed in continuous feeding systems.	Noted.
	19	RBP e) - Insert following words into this RBP ‘Consideration should be given to the administration of appropriate nutritional supplements prior to transport where applicable (e.g. in cases where pasture is deficient in particular minerals or animals are otherwise metabolically challenged).’	Text added to general information.
	18	RBP e). Delete the words ‘and be conducted according to’ and replace with ‘in accordance with’	Agree. Amended,
	16	RBP e). What does ‘to be conducted’ mean?	See above.
	20	RBP e) – this could lead to a 24 hrs delay before next feed (stock into handling pens – 12 hrs, plus travel to sale, plus wait for sales, plus wait for collection, plus delivery to new premises).	Noted.
	16	RBP f) – this is obvious isn’t it? What else would happen?	Emphasis added to <i>immediately</i> .
	18	RBP - Add RBP here reading ‘Ruminants must have access to water at all times prior to transport’.	Added to existing RBP.
	11	GI. 3rd para - ‘A rest period appropriate to the species’. Is this left to the driver to decide? Is it defined in the transportation ‘planning schedule?’	Rest periods determined by outcome based MS to reduce injury and fatigue.

	24	GI. 4th para. The reference to removing food for 24 hours prior to loading is likely to activate ‘fat reserves’ is inconsistent with the example indicators for MS10 (36 hours). We also note that there is a benefit in restricting animals off green feed, but they can still be provided with hay during this period. Recommend this option is added.	Noted. Reference to hay added.
	16	GI 4th para – reference to effluent code of practice is in italics here but not in RBP e)	Amended.
	20	GI. Last para – metabolic status of cattle and horses is inconsistent with other parts of the code where travel in the last trimester is not permitted.	Noted.
	20	Transport of calves goes against the 5 freedoms – the treatment of these animals may not be best practice when viewed on a world stage.	Noted.
4.2.2 Selecting, presenting			
	14	Most of the suggestions in this section should be made into MS’s – based on the welfare acts of other developed countries and available scientific knowledge. Young animals of any species should not be transported more than 8 hours and pregnant animals in the last trimester should not be transported at all.	Noted.
	27	Para 2 – the nine different areas that are listed here are too complex (considering the number of species covered in the code).	Noted, but consider all these factors should be taken into account, as appropriate.
	7	MS7. MS does not define the minimum age for transporting bobby calves – they can be as young as 1 day old and can be transported long distances to slaughter. Bobby calves are of too little value for the farmers to justify feeding them until they are strong enough to withstand the transport and some send them away immediately after the first feeding of colostrums despite the condition of the calf. Minimum age of calf should be defined.	Noted. Code must apply to all forms of transport for even very young animals.
	7	MS7. The MS does not define the stage of pregnancy for various species – heavily pregnant cows and heifers are often transported to the slaughter premises for the purpose of foetal blood collection. Dystocia, downer cows, complicated calving are not uncommon consequences of transporting heavily pregnant cows and heifers. Maximum stage of pregnancy should be defined.	Noted. Covered in outcome based MS.
	27	MS7 – This MS can have all parts combined and reworded to read: a. The decision to transport physiologically or behaviourally compromised animals must be justified If animal welfare would be expected to be significantly compromised during transport, a veterinary declaration as to the fitness of the animal for transport must be obtained.	Noted. Information surrounding responsibilities for transporting an ‘unfit’ animal has been added.
	24	MS7 (a) – All calves, not just bobby calves.	Age limit removed from code.
	19	MS7 (a) Define ‘proper care’. Change MS to ‘Any animal which fails to meet the load criteria must not be transported. In particular, bobby calves must not be transported if they are under 6 days of age. The paperwork identifying the age shall be submitted with the animals. In any question over whether or not the animals are fit to travel, a veterinarian should be consulted.’	Noted. Consider met by outcome-based MS.
	19	MS7 (b) Will the person responsible acknowledge that they failed to take steps in preventing the transport of the animal	Noted, but consider

		because it was likely to give birth? Change to 'Animals must not be transported if they are in the last trimester of pregnancy and/or are affected by metabolic complications of late pregnancy.	this responsibility does rest with the transporter.
	24	MS7 (b) – Endorse this MS but request that the statements in the transport code are aligned to those in the proposed code of welfare for dairy cattle which includes a RBP to the effect that vulnerable animals are transported for the shortest possible time.	Text amended and RBP included to state animals (especially if compromised) should be transported for shortest time.
	11	MS7 (c) . This statement is subjective.	Noted.
	28	MS7 c) and RBP a) – Animals younger than 4 days are immature and do not handle stress and cold from transport as well as food deprivation and however they appear 'fit'. There is no reference for this for animals going to slaughter.	Noted. Information added to reflect this.
	19	MS7 (c) – Suggest change to 'Animals must not be transported unless they are fit enough to withstand the journey without suffering pain or distress. Animals should not be transported within three weeks after a painful husbandry procedure (e.g. horning, castration) has been conducted.	MS amended.
	19	MS7 e, f, g, h, and i) . Suggested changes of wording for all these MS's. See submission 19.	Noted.
	18	MS7 (e) . Change to read 'Deer (with the exception of trophy stags) with hard or velvet antler...	MS amended to address outcome.
	18	MS7 . Add MS reading 'Trophy stags must be transported in purpose designed and built crates and penned separately.	See above.
	27	MS7 – example indicators – can be simplified as: a. Animals are able to stand and be able to bear weight on all limbs b. Deer being transported do not have hard or velvet antler longer than 110mm c. Animals transported are not seen to display symptoms of unreasonable pain or distress All births and metabolic complications of pregnancy attributable to the journey are recorded.	Noted. First indicator amended.
	20	MS7 – example indicators – point 1 is not relevant to this standard	Disagree.
	20	MS7 – example indicators – point 2 'No' – does this mean number or births must not occur?	Text clarified.
	18	MS7 – example indicators – bullet 5 – change to read 'Deer velvet antler or hard antler (with the exception of trophy stags) is no longer than 110mm measured from the centre of the skull.	Amended.
	18	MS7 – example indicators – bullet 6 - delete 'Deer are not carrying hard antler'	See above.
	20	MS7 – example indicators – point 7 – Reference to codes – what are they?	Text clarified.
	16	MS7 – example indicators – many of these are repetitions of the MS.	Noted.
	9, 18,	RBP a) The minimum age to transport bobby calves should be at least 4 days – this should be made into a MS instead of a RBP. Also 'for sale' should be deleted. The purpose of transport is irrelevant.	Information added re: bobby calves and is covered in outcome based MS.
	16	RBP b) Written a bit clumsily. What about 'Whether there is any doubt about an animal's fitness to travel, a veterinarian should be consulted'.	Agree.
	20	RBP c) - Should be MS.	Noted.

	16	RBP c). Should read either ‘within the three weeks following’ or ‘for three weeks after’.	Amended.
	18	RBP c). Add the following to the end of this RBP ‘Exception being deer when velvetted these animals can be transported 7 days after velveting. Spikers with NaturO rings attached may be transported to slaughter within 72 hrs of being velvetted.’	As above.
	20	RBP d) – Would have huge impact on dairy and equine industries – mares arriving to stud before foaling, cows grazing off farm during a dry period. Avoidance of transport during last trimester is usually reserved for rodents, lagomorphs and hystricomorphs (order of rodents – eg coypus, agoutis, pacas, guinea-pigs, chinchillas, porcupines) as they are likely to abort while in transit. This rule would prevent transportation of companion dog in final trimester.	Noted.
	24	RBP (d). Not feasible for the dairy industries. See submission 24 and response to QN 6. Wishes that this be reworded to reflect the need for particular care when transporting late pregnant animals but that does not unnecessarily restrict farm management options.	Noted. Still considered RBP.
	16	RBP (e). Should ‘conducted’ be changed to ‘transported’?	Noted.
	11	RBP (f). Little likelihood – how is this defined?	Noted.
	16	RBP (f) ii. This is a bit tricky, since while it is in an emergency situation, to cause unnecessary pain and or suffering is an offence. Perhaps could replace with something like ‘The animal will be in worse condition on arrival’.	Agree. Amended.
	16	GI. Provide weblink to NZVA form.	Done.
4.3 Loading and Unloading			
	18	Introduction. Second para. This paragraph is out of place and should be in section 4.1 – documentation.	Done.
	16	Intro. Third para – suggest more is said here – either make it an MS or say that there needs to be a roof or some sort of restraint to prevent heads protruding and being knocked off by low bridges or animals actually jumping out.	This is covered in an MS stating that the containers must be suitable for the species carried.
	16	Intro. Fourth para – Change last sentence of intro to read ‘The use of well trained dogs to help with the loading of some species is acceptable.’ – as dogs are used routinely.	Section now amended.
	19	MS8. This MS is ambiguous and open to interpretation. Dogs working with animals must be muzzled. This standard permits a dog to bite many sheep to allow a driver's discretion versus the suffering of many animals from fear, distress and injury from dog bites. Submitter suggests alternative MS's a) to f).	Noted.
	24	Some confusion between the section describing facilities and the section describing loading and unloading.	Noted.
	25	Animals must be off loaded using no means to cause them pain, except in emergency where their reluctance to disembark the vessel immediately jeopardizes their lives.	Noted.
	27	MS8 – The MS, as written, contains inconsistencies. b) allows the use of goads to move stubborn cattle, but d) allows electric prodders to be used on sheep and cattle but c) doesn't permit the use on animals with no room to move ahead. e) ‘Only the minimum force required’ is undefined and therefore effectively unenforceable. h) is also vague ‘must not be overcrowded’ and therefore unenforceable. Recommend that e) and h) are removed. b), c), d) f) and i) are moved to the ‘example indicators’ section. Part h) is subordinate to a). In addition, MS3 could be usefully included in this section.	Addressed and text amended.
	20	MS8. b), c) and d) – change ‘animals’ to ‘stock’.	Left as is.
	13	MS8 (bii). Should be changed to read ‘where essential to move difficult cattle (but not calves, and in this case measures	Agree. Done.

		should be taken to identify and rectify the cause of the difficulty (e.g. raceway design).’ The change from ‘stubborn’ to ‘difficult’ is important as difficulty in moving cattle is often due to environmental factors such as raceway design of fear.	
	13	MS8 (bii). Add – ‘Electric prodders should not be used on any animals other than adult cattle and then restricted to the absolute minimum necessary to complete loading of cattle and use should be limited to the hindquarters of the animal only. If used, prodders should be powered by battery or dynamo and should not be applied for more than one second continuously.’ This point should then be deleted from RBP (h).	Additional restrictions have been placed in the MS around the use of goads.
	19	MS8 (bii) – reword to ‘where essential to move stubborn cattle (but not calves), and not on downer cattle. It cannot be used any more than twice within 15 minutes.	Noted.
	19	MS8 (d) – Electric prodders should not be used in any circumstance. They are also a threat to the quality and value of the end product. Provides cases and photos when electric prodders have been misused – submission 19.	Noted.
	16, 18	MS8 (d). Doesn’t agree with electric prodders being allowed for adult sheep.	Agree.
	19	MS8 (d). Reword to ‘Electric prodders should not be used on any animals other than adult cattle and then restricted to the absolute minimum necessary to complete loading of cattle and use should be limited to the hindquarters of the animal only. If used, prodders should be powered only be battery or dynamo and should not be applied for more than one second continuously.	Noted.
	19	MS8 (e) – suggest reword to ‘Force is not required and must not be used when moving animals. Tails must not be lifted or twisted when loading or unloading animals.	Now changed.
	11	MS8. (e). ‘Only minimum force’. The definition of this can vary between people.	Noted.
	18	MS8 (g). This MS is not relevant to loading and unloading and is covered in MS9 – travel. It should be reworded to read ‘Horned cattle, tusked pigs and animals known to be aggressive must be penned separately if necessary to avoid injury to themselves or others’.	Done.
	19	MS8 (h) Add MS stating ‘Dogs must not be carried in a stock crate with sheep’.	Done.
	18	MS8 (i). Add MS stating ‘Animals must not be thrown, dropped, lifted, or dragged by their tail, head, horns, ears, limbs, wool, hair or feathers.	Done.
	27	MS8 (i) – Well meaning but impractical as effectively, animals can only be pushed by their body to move them.	Noted but considered minimum necessary.
	16, 20, 24	MS8 – Example Indicators. – this repeats requirements of MS3 (d). Suggest this example indicator would be more relevant under MS3.	Is indicator only.
	16	MS8 – Example Indicators – third bulletpoint – Since the MS already allows the use of some force.	Noted.
	16	MS8 – Example Indicators – fifth bulletpoint – suggest use another word as is not clear what ‘disallowed’ means.	Amended.
	13	MS8 – Example Indicators - bulletpoint 6). Add to end of bulletpoint ‘similarly animal handlers should never apply an injurious object or irritant substance to these sensitive areas’.	Done.
	18	MS8 – Example indicators – bulletpoint 9. Delete ‘driven’ replace with ‘loaded and unloaded’.	Done.
	16	MS8 – Example indicators – last bulletpoint – just repeats the MS.	Disagree.
	27	MS8 – Example indicators – these could be simplified – suggestions are given in submission.	Text amended
	18	RBP a). Reword to read ‘Loading should be supervised by animal handlers who should ensure that animals are loaded in a way to minimize pain, injury or distress.’	Done.
	16	RBP c). This is the same as MS8	Deleted.

	14, 17	RBP h). Electric prodders should never be used – and especially not listed under RBP guidelines. A good stockman does not use these devices.	Noted.
	16	RBP h) The MS allows for the use on sheep as well.	Now n/a/
	16	RBP h). A second is very short time and a bit meaningless as written. Suggest replace with ‘instantaneously’ – as in the rodeo code.	Noted.
	13	RBP. Additional point to add – Loud noises such as cracking whips and shouting can induce fear and panic in animals and actually hinder their movement. When moving animals, noise should be kept to a minimum and loud noises should not be used to encourage movement.	Noted. This is RBPb.
	16	GI – para 1 – Think that flight zones may need to be explained more, as this will be a novel concept to many, even though many handlers will know about it in a practical sense. What about including some photos?	Agree. Amended.
	24	GI – para 4 – would be better placed in the GI of MS3.	This is part of loading practice – not loading facility (but also addressed in facilities in code).
	16	GI – para 4 – Already stated in MS3.	Noted. Text amended.
	16	GI – para 6 – What does this mean? Does it mean that working dogs have to work, otherwise their welfare is compromised?	Noted. Text amended.
4.4 Travel			
	20	Para 1, Bulletpoint 1 – Reference or provide this information. Also, driving quality can only be determined by the road conditions, other peoples driving and the ability of the driver of the transporting vehicle to predict what is happening ahead of him.	Noted. Not possible to list all sources of relevant information for all species here. Is up to transporters to source info themselves.
	16	Para 1, Bulletpoint 2 – I am not sure why stocking density is different in a small group in a container to animals transported in a stock crate. Regardless of the mode of transport, an animal requires a certain amount of space.	Noted. Consider it varies in different situations.
	16	Para 1, Bulletpoint 4 – Note that foals at foot will want to lie down.	Noted.
	16	Para 2 – ‘Animals of different species and ages...’ It is size rather than age. Size is obviously dictated by age, but it is more correct to say ‘size’. Once an animal is mature, while its age will change, size and wt will alter. This is also a repeat of info contained in para 1.	Deleted.
	16	Para 3- ‘The maximum duration of a journey...’ bulletpoint 1 – just because an animal has travelled for a long journey (s) doesn’t prepare it for more long trips.	Animals conditioned to stressors of transport.
	16	Para 3- bulletpoint 3 – What special attention? If required does that mean a shorter journey?	Potentially yes.

	16	Para 3- bulletpoint 4 – Not really an issue – longer journeys will require the provisions of food and water anyway.	This is a factor to take into consideration planning journey duration.
	16	Para 3 – bullet point 4 – Does this mean longer journeys mean increased susceptibility to injury (agreed but how long a journey) and disease (are there stats to show this) – metabolic conditions – yes.	Code is referring to impacts of stress on immune system.
	16	Para 3 – bullet point 5 – So this means can pack them more tightly on shorter journeys?	Noted.
	16	Para 3 – bulletpoint 6 – the basic requirements must still apply.	Noted.
	16	Para 3 – bulletpoint 7 – agreed	Noted.
	16	Para 3 – bulletpoint 8 – hard to predict though.	Noted. NAWAC considers it is a duty of people in charge of animals to pay attention to weather forecasts.
	27	MS9 – Recommend that the material relating to MS4 is included in this section. This would see the following material added: a. Any required documentation around the journey must be completed and made available if required Information on documentation should also be included as an example indicator.	To be addressed when sections merged.
	7, 9,14	MS9. Does not oppose with the MS itself but disagrees with the fact that it is not defined and left to the discretion of the transport operator. The ability of some animals (bobby calves, pregnant cows in final trimester) to cope with stress of a long journey is severely reduced. Should define travelling time for different species and age groups.	Noted. To be addressed.
	13	MS9. Add as the first point - a) Unnecessary transport should be avoided: e.g. if animals are to be killed, they should, if possible, be killed at the point of origin, rather than the destination. If they must be transported, journeys should be minimized, e.g. the closest slaughterhouse should be used.	RBP.
	13	MS9. Add point – It should be possible to view all animals regularly during the journey to ensure their safety and welfare.	Noted.
	19	MS9 (c) – If animals are coming from a farm, the farmer will know if they are aggressive. As it is presented, the draft statement permits injury and allows the person responsible to claim that they didn't know the animal was aggressive. Change MS c) to read 'Horned cattle and aggressive animals must be penned separately if there is insufficient space for pen-mates to escape injury'.	Text amended.
	16	MS9 c) – same as MS8	Text amended.
	18	MS9 (c) – impractical as a MS and should be a RBP.	Noted.
	18	MS9 (c) – reword to read 'Horned cattle, tusked pigs and animals known to be aggressive must be penned separately if necessary to avoid injury to themselves or others.	Done.
	16	MS9 d) – same as MS 2 (f)	Done.

	19	MS9 d) - To demonstrate injury to the back of an animal would require sufficiently extensive injury – only in this case could a prosecution be made. The current wording allows a certain level of injury. This MS should be changed to read ‘When animals are standing, they must have sufficient headroom to adopt a natural position without touching the overhead structure’.	Noted.
	19	MS9 d) – Impeded airflow is a risk to the welfare of the animals if they are forced into crates which do not allow room for air flow above their bodies.	Noted.
	18	MS9 (d) – reword to read ‘There must be sufficient space within the container to allow the animal to adopt its natural posture.’	Done.
	20	MS9 d) – add cats, dogs, pocket pets, birds, llamas, alpacas, fish, amphibians, reptiles and aquatic species.	Applies to all animals.
	19	MS9 – believes that point 4.6 from the Code of Recommendations and MS for the Welfare of Animals Transported within NZ should be included in this draft code.	Agree. Has been included in code.
	19	MS9 – Suggest new MS reading ‘animals should be rested for a minimum of 8 hours every 24 hours’	Noted.
	19	MS9 – Suggest new MS reading ‘Animals being transported must not be overcrowded preventing them from being able to move from handlers or animals, where this is likely to contribute to distress and injury. Packing animals either too loosely or too tightly in stock crates predisposes them to injury. Partitions must be used to reduce group sizes and to separate classes of stock’. The density of loading animals in stock crates MUST be determined by the need to minimize injury and allow cast animals to rise without assistance. This submitter has provided a number of case studies to emphasise their point here (submission 19).	Addressed in stocking density.
	19	MS9 - Suggest adding the following MS’ ‘Livestock must be segregated by sufficient internal partitions to minimize the risk to the welfare of other livestock based on the nature of the intended journey and the numbers of animals within the pen, in order to reduce surging.’	Not good practice.
	19	MS9 – Suggest adding the following MS ‘The person receiving the livestock must make arrangements without delay for separating weak, ill or injured livestock for rest and recovery. They must also arrange without delay appropriate treatment, including efficient humane destruction by trained and accredited competent people for severely injured or dying animals and disposal of dead stock.	To be considered.
	20	MS9 – example indicators – this is too open for MS’s which are legally binding. Must be prescriptive.	Noted.
	16	MS9 – example indicators – bulletpoint 1 – what does this actually mean and how does it relate to this particular MS?	Disagree – distress is relevant.
	18	MS9 – example indicators – bulletpoint 1 – reword to read ‘animals are in no worse condition on arrival’	See above.
	16	MS9 – example indicators – bulletpoint 2 – what if animals have chosen to sit down e.g. foals, bobby calves, and deer. Suggest this is changed to ‘animals must be able to stand and bear weight on all limbs on arrival’.	Covered in MS.
	16	MS9 – example indicators – bulletpoint 6 – already stated.	Text amended.
	20	RBP (a) – Length of journey not relevant if animals are transported in comfort and not in physical pain, in which case they should be slaughtered at home.	Noted.
	19	RBP (a) – suggest that this is made into an MS	Noted.
	16	RBP (b) – Doesn’t understand why they should be able to ensure necessary thermoregulation. Presumably they will get up if they cannot. Surely they must also be able to mountain while they are standing?	Disagree.
	18	RBP (b) – change word ‘normal’ and replace with ‘natural’.	Done.

	19	RBP (b) – add words ‘Animals must be at the appropriate stocking density, so they can rest during longer journeys. When animals lie down.... Thermoregulation. Consideration when calculating density must be given to length of wool, ability to stand without assistance, weather, humidity, wool length and nature of the journey.’ This should be made into a MS.	Noted.
	19	RBP c) – this should be made into a MS.	Noted.
	16	RBP e) – What does this actually mean? Is this possible when the indicator states ‘loading density allows animals to adopt normal posture while being supported by others if they are required to stand for the journey? I think the reality of achieving this is zilch.	
	14	RBP (f) . Based on several studies it is more appropriate to rest animals every 12 hours to minimize stress and suffering. This sections needs to be based more on current understanding in scientific studies.	Noted.
	20	RBP f) – 24 hours is too long. Check publication ‘farm animal transport journey times’ from the ‘Trading Standards Institute’. Also outlines additional requirements for transporting cattle, sheep, horses, goats and pigs.	Disagree.
	16	RBP f) – But this is contradicted by h) below. Suggest that this should state ‘Mature animals...’	Done.
	19	RBP h), i) and j) – Submitter wants these as MS’s.	Noted.
	7	RBP h) This should be reduced from 12 to 8 hours and should become a minimum standard.	Noted.
	18, 20, 24	RBP (h) – Definition of ‘young’ required (especially when code covers multiple species as well as commercial and companion animals.	Deleted.
	18	RBP (h) – is 12 hours applicable for all species?	Noted.
	18	RBP (j) – Reword to read ‘Lactating animals should be milked or suckled prior to transportation and then at least once every 24 hours.	Done.
	20	RBP j) – Suckling animals need to suckle more often than every 24 hours.	Noted. This refers to lactating animals, not suckling animals.
	16	GI . Would like to see some guidelines on stocking densities. The last 2 sentences of the GI seem out of place. It’s the first mention about anything to do with the sea. Shouldn’t the penultimate sentence be in the monitoring section? Last sentence – the only way to do this is to allow more space per animal.	Done.
	9	Doesn’t believe it is unreasonable to give a maximum distance that calves may be transported. In general, as the distance/time of transport increases, the more animals that arrive are dead, moribund and condemned in the yards. Submitted recommends a maximum distance as a minimum standard and ‘closest available processing facility’ as a RBP.	Comments in these sections to be addressed prior to code being finalised.
	17	Wishes to see a reduction in the amount of time that animals are legally able to be transported for without water and often in hot conditions.	Noted.
	12	A limit on the duration of transport for cull dairy cows would prevent dozens, perhaps hundreds of condemnations every year. 8 hours would be an effective limit.	Noted.
	16, 24	Wishes to see the inclusion of stocking densities as in the Code of Recommendations for...transport in NZ. This would help those transporting animals. There are no MS’s relating directly to loading densities, just indicators and RBP’s. This is a very important facet of transportation that is not covered very well in the draft code. Submission 24 suggests providing stocking densities as stated by Broom, D.M. 2008.	Covered in outcome based MS.

4.5 Food, Water and Rest			
	24	This section should include some information about providing adequate space on the feed-face for the number of animals.	Noted.
	16	Intro – 1st para – Is this for all spp. Or just ruminants.	Changed to clarify.
	20	Intro – 3rd para – This depends on the spp. And seems to retrograde from the current guidelines which detail water provision every 12 hours and food every 24 hours.	Not intended.
	16	Intro – 3rd para – But states in indicators that it's ok for ruminants to go for 36 hours before food.	Now clarified.
	19	MS10 (a) – Clear direction needs to be provided here. Change to 'Animals must be fed and watered using clean water from a familiar source prior to, during and immediately after unloading in order to meet the requirements of the health and thermoregulatory needs. Times of loading must be recorded to allow accuracy for feed and water provision. There should be adequate space for all animals to move to the feed and water sources and provisions made to address likely competition for feed.	Noted. Consider outcome-based code meets min necessary, as required by AW Act.
	20	MS10 (a) – Provide references for each spp.	Disagree – not in code.
	16	MS10 (b). Time of slaughter would appear beyond the remit of the Transport code. Is this not covered in the slaughter code?	This is covered in both codes intentionally so that transport operators are aware of this requirement.
	18	MS10 b) – 'As soon as possible' is very subjective – therefore recommend that it become a RBP. Change MS to read 'Bobby calves and milk lambs must be fed or slaughtered within 28 hours...	As soon as possible is a more stringent requirement than just having within 28h.
	19	MS10 b) – Suggest change to ' Bobby calves and milk lambs must be fed or slaughtered as soon as possible and within 12 hours after loading for transport. Calves and lambs must be fed within 2 hours of transportation. Only calves that have learned how to drink from a trough or from a nipple can be transported for longer than 6 hours.	Disagree but noted.
	20	MS10 b) – 28 hours would give an effective 32 + hours from last feed to death. This means that the calves will have missed 3 feeds by this time. Bobby calf guidelines suggest that if the journey lasts more than 12 hours, then they must be slaughtered as soon as practicable, or instead fed.	Noted.
	16	MS10 b) – Is this loading in the truck or loaded into the calf pen?	Clarified as loading for transport onto the conveyance.
	27	MS10 – This MS should be aligned with the Code of practice for the minimization of stock effluent.	This is intention.
	27	MS10 – Example indicators – suggest that these are rewritten as: a. A record is maintained when food and drink is offered b. Any abnormal response to the offered food and drink is recorded c. Resting periods during transport when animals are unloaded are recorded	Added but not rewritten.

	18	MS10 – Example indicator 1 – Water – Ruminants – should this be 12 hours?	Disagree. 24hrs.
	21	MS10 – Example indicator 1 – Feedback from veterinary experience is that pigs do not drink on a journey and the provision of water means that the flooring becomes slippery.	Noted. This MS is as required by species.
	20	MS10 – Example indicators 1 – Monogastric animals – small mammals would normally be packed with sufficient gels to last at least twice the journey time. Horses would be ok for up to 8 hours, dogs and cats - more often.	Noted.
	20	MS10 – Example indicator 1 – Why has the MS for water been changed from the current code '12 hours for mature ruminant, lactating animal 8 hours'.	12 hrs for pregnant or lactating ruminants sufficient.
	24	MS10 - Example indicators 2 – Have concerns that it is not clear that the time limit of 36hrs without food includes time spent off feed in preparation for the journey. This should be made clearer in introduction. We would also suggest that 36hrs, with 24 in transit, is longer than normally occurs under NZ conditions. DairyNZ suggests that the maximum time off food for all ruminants should not exceed 24 hours.	Clarified.
	20	MS10 – Example indicators 2 – feeding intervals are a retrograde step – it is almost acceptable to feed once in 24 hours for ruminants that are not pregnant or lactating, not 26 or an effective 40 since last feed. Doesn't comply with 5 freedoms.	Noted. But covered by outcome based MS.
	13, 20	MS10 – Example indicators 1 and 2 – for both food and water it should be changed to read 'within the following indicative periods (and within 2 hours of arrival unless the animals are sent for slaughter immediately). Note that the submitted thinks that these periods of food and water deprivation are too long (especially for young animals), and recommend that the maxima that apply in the EU should apply in NZ too.	Noted.
	24	MS10 – Example indicator 4 – long haul transport will inevitably result in some dehydration. Suggest this is change to read 'minimal signs of dehydration observed'.	Animals should not be dehydrated to point where symptoms can be observed. Reflected in text.
	18	MS10 – Example indicator 5 – change to read 'Bobby calves fed within 2 hours prior to transport.	Amended.
	24	MS10 – Example indicator 5 – change 'bobby calves' to 'all calves'.	Done.
	16	MS10 – Example indicator 5 – The EI for MS6 says 'are fed a maximum of 2 hours prior to transport'. These two statements need to say the same thing.	Done.
	7	Example Indicator 5 - Feeding bobby calves within 2 hrs prior to being picked up from the farm should be compulsory. Demand for energy is high and if not fed for prolonged periods of time (often for up to 28 hours when transported and then kept in holding yards prior to slaughter) they often die – this should become a minimum standard.	This is intention.
	20	MS10 – Example Indicator 5 – It is not practical to feed bobby calves 2 hours before loading as the arrival of transport could be variable due to road conditions etc – but arrangements should be made for offering their second feed of the day where travel and holding times move towards the afternoon feed.	This is the minimum necessary to meet the requirements of the AW Act.
	16	MS10 – Example Indicator 6 – not clear what 'familiar source' is.	Dictionary definition.
	20	MS10 – Example indicator 7 – Checking that food and water has been taken and that it is presented in familiar containers should be an MS.	Pre-conditioning and provision of food and

			water is covered in MS.
	18	MS10 – Example indicator 7 – change to read ‘Absence of signs of hunger and thirst.	Disagree. But lack of dehydration included as EL.
	16	RBP (b) . No source of water at the arrival point is going to be familiar to the animals. Suggest ‘Clean drinking water should be available from a source similar to that to which the animals are accustomed while being held...’	Noted and text amended.
	20	RBP (b) . Does this mean water from original quarters or water presented to animals in containers that they recognize as water containers?	Noted and text amended.
	16	RBP b) – probably not practical.	Noted and text amended.
	20	RBP (c) . What spp does this refer to?	Clarified.
	16	RBP (d) . Isn’t this obvious. I would delete this as it is covered by f).	Combined.
	16	RBP (e) . What?	Deleted.
	13,14, 20	MS10 and RBP (e) . – ‘appropriate’ and ‘appropriate intervals’ should be specified according to species and age groups.	Too prescriptive.
	16	GI. Para 2 . While I agree that the code should cover all species, the draft is mainly about production animals. To place this point here seems a bit odd.	Deleted.
	25	Species specific food and water should be available to animals constantly and must be adequate for a minimum of 24 hours.	Noted.
4.6 Ventilation			
	24	This section may fit better under section 3.	Ventilation information moved.
	16	Intro – Is ‘core body temperature’ the same as ‘thermoregulation’ which is used elsewhere in the code?	Deleted.
	19	MS11 a) – The term sufficient is ambiguous and open to interpretation. There is no regulator to test this in each transport to assess compliance. The code should be changed to prevent problems before, rather than after the event has occurred.	Noted. Has a legal meaning according to dictionary definition.
	20	MS11 a) – Address the problem of dog boxes at road level.	Addressed in MS – no build up of noxious gases.
	16	MS11 b) – In reality, would transporters know what ‘thermoregulation’ actually means?	Amended.
	16	MS11 b) – Would like to see either a separate MS that remedial action must be taken when the ventilation is not meeting (a) and (b), see MS7 in the broiler chicken code, as an example.	Outcome based in that ventilation must be adequate.
	18	MS11b) - change to read ‘Ventilation during travel and rest must be appropriate to maintain the body temperatures within the normal range for the species.	Done.
	19	MS11 b) – Suggest change MS to read ‘Sufficient ventilation shall be provided to ensure that the thermoregulatory needs of the animals being transported are fully met taking into account in particular the number and type of animals to be	Met by outcome-based MS.

		transported and expected weather conditions during the journey . Containers shall be stored in a way which does not impede their ventilation.’ The ventilation system must be capable of ensuring even distribution throughout with a minimum airflow of nominal capacity of 60 m ³ /hKN of payload. It must be capable of operating for at least 4 hours, independently of the vehicle engine.	
	18	MS11 – example indicators – The second bulletpoint should be changed to read ‘Crate or container free of the smell of noxious gases such as exhaust fumes and excessive ammonia’.	Done.
	16	MS11 – example indicators. The third bulletpoint is not an indicator. Suggest removal as it is covered in the next MS on monitoring.	Noted.
	27	MS11 – example indicators. Suggest that these are rewritten as: 1. Signs of distress associated with hypo or hyperthermia are acted on and recorded 2. Any abnormal behaviour associated with inadequate ventilation is acted on and recorded	Done for discussion.
	20	RBP – should clarify that dog boxes carried by the exhaust of a car or under cattle transporters are outlawed at the level of car exhausts.	Noted.
4.7 Monitoring Animals			
		Intro – Am presuming that this means possible adverse effects on the animals caused by a mechanical and structural problem, since it reads it looks like monitoring the animals for mechanical and structural problems.	Amended.
	19, 20, 22, 24	MS12 (a) – Define ‘regular’ – what frequency is this? It is likely that some drivers will interpret ‘regular’ as what is convenient to them. This MS should be more prescriptive. It is unacceptable that the RBP is not part of the MS.	Noted. More guidance has been added around this MS.
	27	MS12 a) rewritten as ‘Animals must be inspected during the journey if required’. b) should be deleted.	Noted.
	14	MS12 – Needs specific time frames to be specified to minimize subjective interpretations.	Noted but not appropriate for outcome-based code.
	13	MS12 (a) add – whenever the driver takes a rest stop, after meal breaks and refuelling stops, and thoroughly inspected when they are rested and unloaded.	Added as suggested indicator.
	18	MS12 (b) – Recommend that this be an RBP.	Noted. Clarified that recording can be after journey.
	19	MS12 (a) and (b) - There is no requirement for a driver to address an animal welfare incident but there is a requirement to record such an animal welfare incident. The driver must know that he is to address all and any incidents. Change this MS to read ‘Animals must be inspected 30 minutes after leaving the source of loading and every 2 hours during the journey, according to the journey length. If the person in charge is notified of an animal which requires assistance or if an animal is found to have fallen down or be injured, distressed or with a limb protruding, the animal must be given immediate assistance by the person in charge. Every effort must be made to get cast animals to their feet.	Noted. Not practical for short NZ journeys. Can cause more problems. Now an outcome-based MS addressing part of this comment.
	22	MS12 (b) – Define ‘incident’.	Clarified.
	19	MS12 – Add MS (c) reading ‘The person in charge shall ensure that they have a contingency plan to assist in the event of a major incident such as roll over, several downer animals, birthing animals, injured or moribund animals.	Dealt with elsewhere.

	27	Example indicator – Rewritten to read ‘The time and place of inspection and any incidents observed, be recorded’	Done.
	18	RBP b) – Strongly recommend that this be a MS.	MS added.
	24	RBP b) –Recommend adding ‘or separate them so they can’t be stood on by other animals’ to the end of the last sentence.	Text amended.
5/5.1 Land Transport			
	14	All of section 5 - needs specific time frames to be specified to minimize subjective interpretations.	Noted, but code is outcome-based.
	18	Intro – Add before first paragraph – ‘Animals should be transported in purpose designed and built containers appropriate for the species to be carried’.	Now addressed elsewhere.
	18	MS13b) – This standard should be deleted as it is covered by (and at variance with) standard 12a).	Disagree. But more guidance has been added around rest breaks.
	20	MS13b) – Animals should be checked every 5.5 hrs – when drivers must take a one half hour break. The draft code does not address the possible change of drivers and the requirements to continue with the inspection schedule.	Outcome-based code.
	22, 26	MS13 b) – Drivers may not take a break – therefore animal welfare is compromised. Recommend that animals are checked every 2 hours and require documentation to be completed on each check.	This is covered by requirement in monitoring MS.
	16	MS13 b) – Should this be in the monitoring section?	Noted but also a particular requirement for this form of transport.
	27	MS13 and MS14 – This submitter wants code to focus on commercial transport only and so these two MS’s would be redundant.	Noted. Code applies to all transport but these sections modified accordingly.
5.2 Transport of animals...			
	18	MS14 – reword to read ‘While a vehicle is on a road or highway, animals (such as working dogs) must be secured or enclosed in a crate.	This section now amended.
	19	MS14 – Change to ‘While a vehicle is on a road or highway, animals (such as working dogs) must not be carried on the open rear of a light truck such as a utility or flat bed truck unless the animal is secured in a manner which prevents the animal from falling off the side. The dog must be protected from the wind, for example by firmly securing it hard up against the cab. There should be a swivel between the securing point on the vehicle and the collar, and the securing lead or chain should be long enough to permit the animal to stand, lie down and move about but should not be of a length which would permit either the front or the hind legs reaching the side of the tray when the animal is standing in a normal posture. In the case of livestock, they must be enclosed in a crate. Protection in wet or cold 10 degree C weather and hot 30 degrees C weather must be provided. Care must be taken to ensure that the animals are neither too loosely nor too lightly loaded. Where a vehicle is lightly loaded, the vehicle must be packed with hay bales or the vehicle should be	As above.

		divided by partitions.	
	24	MS14 – Suggest amending the wording ‘animals (such as working dogs)’ to read ‘all animals (including working dogs)’	Now amended.
	16	MS14 – Are animals other than dogs actually carried like this in NZ?	Now amended.
	16	RBP – These could also apply to section 5.2	Agree.
	5	Lifestyle farmers carry calves/lambs etc in trailers. There is a need to cover the front of caged trailers to protect animal occupants from the wind.	This is required in remainder of code.
	5	Animals carried in small trailers have no means to help them stay upright and no cushioning if they do fall. Also stated that some owners place calves in the boot of the car to transport them to the sales. Suggests that wording of this part of the code should be more specific and prescriptive – avoid use of ‘refer to minimum standards elsewhere in the code’ as people are unlikely to read the entire code.	Noted.
	10, 20	This section should also include private carriage of pets in cars. Does this mean seat belts for dogs in cars? Address.	Done.
	10	RBP. This is not best practice and can in fact increase danger to the animals. The hay itself can cause problems unless it can be secured, which is very difficult. Partitions are much more practical. It would be more appropriate to recommend underfoot conditions which allow the animals to maintain footing during transport.	
	20	Refer to codes of separate spp. for stocking densities.	Noted.
5.3 Rail Transport			
	10	Rail transport – to the best of our knowledge, large animals are no longer transported by rail.	Noted.
6. Transport... NZ Waters			
	1	Heat stroke and heat stress are a significant risk for animals transported by sea – especially in ruminants. If air flow is compromised for <30 minutes, deaths can occur. Reliance on inspections by the driver/stock attendants may not be sufficient to prevent heat stress morbidity and wishes NAWAC to consider the provision of portable data-loggers to be placed in the pens which activate an alarm when temp and RH% reach a dangerous level – thus alerting staff and enabling contingency measures to then be put into play. He is not sure of the practicality of obtaining or using data loggers, but provides contact details for [REDACTED], who did some work for MAF in this area a few years ago.	Noted. MS elsewhere require this not to happen, regardless of the form of transport.
	16	Intro, para 2. – what about when they are still in NZ territorial waters as noted in 1 st para?	Animal export is covered by provisions in the Animal Welfare Act relating to Animal Welfare Export Certificates and MAF Standards.
	16	Intro, para 3. – suggest that there is a ‘however’ at the start of the second sentence in this para as the first sentence seems to be contradicted by what follow next.	Agree. Text changed.
	19	MS15a) – Change MS to read ‘... must be loaded to a density which allows access to feed and water, to rise unassisted and room to move freely within the pen. Feed and water must be available to all animals.	Noted.
	20	MS15 a) – Stock or cattle – horses need to be fed more often, and doing so may be difficult on a ferry. Should be offered food before boarding the ferry. Care of dogs on ferries?	Noted. Ferry journeys in New Zealand are

			not long. Also, horses can be offered hay for duration of transport.
	16	MS15 a) – Need to delete the word ‘possible’ as this doesn’t mean that they must be fed and watered every 24 hours – I am presuming that this is the intent of the MS?	Text clarified.
	16	MS15 a) – Note that elsewhere it says that mature ruminants only have to be fed every 36 hours.	Agree. Text clarified.
	19	MS15 b) – Define ‘if circumstances warrant’. Suggest reword to read ‘...master must allow these people unimpeded access to the animals for inspections. The animals must be inspected during the first 15 minutes of the start of the journey and at least every 30-60 minutes thereafter.	Noted, but contra to maritime safety requirements. Additionally, ferry voyages in New Zealand are short.
	19	MS15 c) – Add sentence at end of MS reading ‘Trucks carrying animals on roll-on roll-off vessels should be on the vessel for the least amount of time possible.	Included as RBP.
	16	MS15 d) – what does ‘safe’ mean?	Text clarified.
	19	MS15 d) – change to ‘Sufficient ventilation shall be provided to ensure that the thermoregulatory needs of the animals being transported are fully met taking into account in particular the number and type of animals to be transported and expected weather conditions during the journey. This is especially important where the animals are transported in a secondary vehicle or container on enclosed decks’.	Noted. Text clarified.
	19	MS15 e) – Define ‘adequate provision for regular monitoring’. The RBP states that animals should not be transported aboard unmanned barges – this is what the livestock industry should be complying to. A lesser standard allows animals to be carried at risk. Change MS e) to read ‘Animals must not be shipped in unmanned barges.’	Noted.
	19	MS15 – Add MS – Suggests that a new MS should be added reading ‘During rough weather during sea transport, the level of inspection will be dictated by safety requirements for the crew. Livestock are more likely to fall down during rough weather so inspections must be carried out as soon as conditions allow and appropriate remedial measures taken. Assistance with downed, injured or distressed animals must be sought as soon as the vessel docks if on-board assistance has been unsuccessful. If necessary, injured animals must be destroyed without delay.	Noted. Consider outcome-based MS meets same outcome.
	16	Example indicators – suggest that more indicators are added here.	Noted.
	16	RBP a) Could amend to read ‘are loaded last and offloaded first’ – this principle is written in the IATA regulations.	Agree. Amended.
	19	RBP b), c) and g) - should be made into MS’s.	Noted. Not considered necessary.
	16	RBP d) – This is already covered by MS 15 d)	Agree. Deleted.
	16	RBP (g). Is this a MAF standard? Perhaps a link?	Disagree.
	16	Gl. 4th para. Who makes the decision about whether it is reasonable. This is a bit wishy washy. I like what is written in the current standard.	Noted.
	16	Gl. 5th para. What is reasonable?	Noted, but consider that Act uses ‘reasonable’.

7. Transport of animals by air			
	0	Suggests that current vaccinations should be given opportunity to be at full strength at time of transport and so should be given 14-21 days in advance of flights, also animals carried on ships and animal transport vehicles.	Noted. Under consideration.
	4	Has a concern with holding of cats and dogs at airports prior to being loaded onto the plane. The animals are held in very busy, loud and often hot areas waiting to be loaded – in both domestic and international freight. Also hear of horror stories where cats are left in their carriers on hot tarmac where they suffer permanent damage. Suggests that separate rooms should be provided to hold the animals prior to loading so that they are not exposed to so much noise and are less stressed.	Referred to IATA regulations here.
	4	Has a concern with the practice of drenching cats with dangerous products for flea treatments from overseas.	Noted.
	16	Intro – suggest IATA is written in full here.	Agree. Text amended.
	19	MS16 – comments that documentation must accompany all animals. And this requirement must be included. Change this MS to read ‘Domestic air carriers must conform to the current IATA regulations when accepting and carrying animals. All documentation including time off water and feed, and incidents which would affect the welfare of the animals must be stated. Stressed, distressed animals must be handled with care, and action taken to alleviate their condition. Animals with injury must be attended to without delay. Veterinary attention must be sought or the animal shot.’ Wants prescriptive direction for this MS.	Noted. Outcome-based MS is appropriate.
Transport in Emergencies			
	16	First sentence. Fires are not necessarily anthropogenic. Perhaps use traffic accidents for this example?	Noted.
	16	Intro – Are readers of the code going to know what anthropogenic means?	Noted.
	16	Intro – 3rd sentence – unsure of what is being said here – needs to be more clearly spelled out.	Agree. Text simplified.
	16	Intro – final sentence – effectively repeats the previous sentence.	Text now simplified.
	19	MS. Wants new MS’s to be added to this section reading ‘a) Owners and persons in charge of animals must have a documented plan that provides for transport to safety in the event of an emergency for every animal that they are responsible for and b) Appropriate veterinary advice and/or supervision of suffering or weak animals must be sought during transport in emergencies.	Noted, but not considered minimum necessary to meet purposes of the Act.
	18	RBP a) – The requirement for a documented emergency plan is not practical. Recommend that this RBP is deleted. *change to read ‘persons in charge of...’	Noted. This RBP has now changed.
	16	RBP a) – does this apply to anyone transporting an animal e.g. taking your pet dog to the vet, taking a trailer load of sheep to a saleyard etc	Noted. This RBP has now changed.
	27	RBP – provisions around best practice are overly onerous as states and should be qualified by addition of the words ‘as required’ and ‘as practicable’ for a) and b)	Noted. These are only RBPs.
	19	GI - It is stated in the GI that information is available on the internet – assumes that everyone has access to internet. Material should be circulated in hard copy as widely as possible.	Noted.
9. Emergency Humane Destruction			
	18	MS17a) – Change to read ‘Persons undertaking humane destruction must be competent in the killing of species unless the safety of the animal and/or people at risk. (noting incident in Christchurch last year when cattle beast escaped and had to be shot by police).	‘Competence’ angle removed – but outcome of

			insensibility until death remains in MS.
	19	MS17 a) add following words to the end of this MS ‘and make every effort to ensure death and confirm the animal is dead’.	MS states that animals remain insensible until death has occurred.
	16	MS17 a) or be able to access a place where an animal can be killed? Are we expecting all drivers to carry a firearm, captive bolt etc?	Noted. Text amended.
	20	MS17 b) Minimise exposure of other animals to the destruction of an animal.	Not an MS.
	16	MS17 b) – Need to be careful with word ‘minimise’ as section 12 (c) of the AWA makes it an offence to kill an animal in a way that causes the animal to suffer unnecessary or unreasonable pain or distress. – it doesn’t say ‘minimise’	MS states that ‘Animals must be rapidly rendered insensible’.
	19	MS17 c) – add the following sentence to the end of this MS ‘When loss of consciousness is not immediate, induction of consciousness should be non aversive and must not cause anxiety, pain distress or suffering of the animals.	As above.
	24	MS17 c) – Delete the words ‘in the event of an emergency’.	Agree. Deleted.
	24	MS17 e) – Bleeding out is only necessary if the method used to kill it has only rendered it insensible. This is not clear in the MS as it stands and it reads as if all animals need to be bled out. Suggest this point is re-phrased to read ‘where an animal is rendered insensible but not killed outright, it must be bled out immediately to ensure death occurs before recovery from stunning’. The GI could also provide information about checking for signs of life after being rendered insensible – might be appropriate to include information about this in MS17 (i.e. animals rendered insensible by firearm should be monitored for signs of life for 5 minutes, if not bled out immediately).	Disagree. Is best to err on side of caution and ensure animal cannot regain consciousness.
	16	MS17 e) suggest we ‘promote’ shooting by putting it first.	Destruction by injection is humane too. Equipment must be well maintained.
	13	MS17 – Add MS. Add additional point – Devices for slaughtering animals should be in good condition (e.g. knives must be sharp) and appropriate for the animal (e.g. captive bolt device cartridge strength or firearm calibre). Delete this point from RBP d).	Noted. Text added to introductory information.
	19	MS17 – Add MS stating – f) ‘Where a trained and accredited competent person is not immediately available to humanely destroy an animal, a trained and accredited competent person must be contacted without delay to carry out the procedure without delay’. g) Where there is a road accident involving the transport vehicle, all animals must without delay be 1. Assessed, in the standing position if possible; ii) humanely destroyed at the accident site. The person must be trained and competent to undertake this task.	Noted. This MS is outcome-based and intended to achieve same outcome.
	16	Example indicators – more needed.	Noted
	19	RBP a) – Should be made into an MS and the following sentence added to the end ‘ Animals to be killed must be handled, restrained and killed in such a manner as to minimize unnecessary pain and distress prior to death.	Noted. Not considered the minimum necessary. Remainder already MS.

	20	RBP a) – predetermined plan – this needs to be expanded to guidelines.	Noted. Information about contingency plan in ‘planning’ section.
	16	RBP b) and c). These two points are not about humane destruction. They should either be moved or perhaps the title should be changed to ‘Emergency treatment and humane destruction’.	Disagree. Are relevant to the topic.
	19	RBP b), c), d), and e) should be made into MS’s.	Noted but not considered minimum necessary.
	20	RBP c) – Separating sick animals – commendable but not practical under most circumstances.	Noted. This RBP now deleted.
	16	RBP c) – Is this animals that are loaded sick or injured or that become sick or injured.	Noted. This RBP now deleted.
	16	RBP e) – Why by a veterinarian? There could be a number of obvious reasons, sharp or protruding objects, ventilation flow, inclement weather etc that would be very obvious to the transport operator and a vet would not have to be consulted.	Agree. Clarified.
	16	GI – final para – Appendix II. Why necessarily a veterinarian? Getting advice or training from an experienced person would be just as good – possibly better.	Agree. Text amended.
	20	Provide references for this section.	This detail is provided in code report.
	20	Whole of pp. 36 is stock specific.	Agree. Text now provided as appendix.
10 Quality Management			
	27	The inclusion of this section adds weight to the fact that this code should be focused on commercial transport of animals only.	Noted.
	21	This section should be entitled ‘Welfare Assurance’ because this is its focus.	Noted. Section clarified.
	8	Any form of quality management documentation is unnecessary. The suggestion at additional quality assurance material be provided undermines the primary purpose of the code. As long as livestock handlers are adhering to the codes requirements, there will be no need to develop additional quality assurance material.	Noted. Also note these are RBPs not MSs.
	12	This section needs to be clearer and go further: A. meat plants should be required to investigate the transport circumstances (journey duration) for any incident resulting in significant sickness, injury or death. They should be required to provide the Veterinary Technical Supervisor of the plant with these details. B. As many of the recumbent/euthanased cows walk off the truck, and do not often become recumbent until the following morning, transport operators would not be aware of many of the losses and could not be expected to report them. C. Compliance by yard managers could be easily verified by the meatplant veterinarian, creating a much more robust quality management system.* (also see footnote for submission 12 at end of this table)	Noted. This should be built into industry QA schemes.
	19	These requirements must be upgraded to MS’s and also a new MS added reading ‘The quality assurance system must	Noted. Appropriate

		demand that all incidents of non compliance with this code, and any incident resulting in significant sickness, injury or death of animals be reported to the regulating authority for investigation.	systems for reporting animal welfare complaints already in place in New Zealand. QA schemes not considered minimum necessary for meeting purposes of the Act, but rather are appropriate as RBPs.
	20	RBP f) – Of whom, by whom and what training?	Noted. Considered to be in context of previous RBPs.
Appendix I			
	8	The code proposes that the checklist would be filled out by a transport company, conveyance operator or their agent. Submitter will not support this proposition and questions the checklists relevance.	Noted.
	16	In terms of auditing monitoring of animals during a trip it would make sense to list the times/places that animals were checked.	Rest stops included.
	19	The list must include any incidents which will affect the welfare of the animals, for example delays in transport, poor or hot weather, injured or ill animals.	Disagree
Appendix II			
	7	The optimum position for hornless sheep and goats are not the same as those recommended by the Humane Slaughter Society (see Cheryl).	These figures are from HSA, as per other codes.
	7	Replace existing photos with those recommended by the humane society.	As above.
	9	Doesn't give a recommended site or any guidelines for the humane destruction of calves.	Figures are not given for any species. See relevant species specific code.
	16	Suggested that words 'with the shot directed down the line of the spinal cord' be added to instructions for cattle, and sheep and goats.	See relevant species specific code.
	28	This appendix is correct for all animals except polled sheep. The correct position of the captive bolt is from the highest point on the head down. With the current recommended position, there is a chance of missing the brain. This has been recommended by the humane slaughter association and submitter has attached information in regards to this in the submission (28) - which are on page 12 of this brochure.	See species specific code.
Appendix III			
	20	The terms 'journey' and 'animal' should be defined here.	Agree. Animal already defined.

			Journey definition to be added.
	16	The term 'pest' is not used in the code.	Noted. Removed.
	16	The term 'transport operator'. Is this the generally accepted use of this term? I thought it referred to a truck driver?	Noted. Definition for use within this code.
Appendix V			
	8	Should be referenced within the relevant sections of the main body to enable readers to ascertain the information's origin.	Noted.
Additional Comments			
	3	Draws attention to a survey conducted to examine hide and skin qualities across NZ export product. Shows that 31% of cattle hides and 80% of deerskins exhibited lesions that originated from mechanical damage occurring in the period immediately prior to slaughter. Supports the code and would like to see it used forcefully to improve handling systems in transport.	
	8	Code does not meet industry expectations. Expected audience will find it too difficult to read, and too long, to interpret and will disregard contents. Code attempts to cater to a large wide ranging audience comprehensively rather than separating out and individually targeting audience sectors.	
	8	Suggests that code be divided into 3 separate parts. One part to deal with commercial animal movements, second to cater for private animal movements, and third to accommodate similar themes that apply to consignors, transporters and movements of animals commercially and privately. Suggests that the commercial animal movements should then be split into sub-parts to provide information specific to consignors and to transporters according to their specific transport modes.	
	8	Superfluous information should be removed from the code. The introductions, MS, example indicators, RBPs are unnecessarily repetitious. All information except the RBP's should be removed from the code – non-essential information could be made available to readers in other sections away from the main body of the code. RBPs should also be supported by references to standards/rules/regulations.	
	8	Has a concern with the change-over of responsibility from consignors to transporters. States that the consignors role is to ensure that animals are fit for transport. The transporters role is to receive and transport animals safely to their destination. Makes the point that transporters will not accept suggestions that they are accepted to monitor and control the pre-selection and presentation of animals for transport or be held accountable for acts or omissions committed by consignors. Wishes to have ALL references transferring responsibility from consignors to transporters removed from the code.	
	8	Code contains proposals that have deep seated ideological overtones which seek unrealistic outcomes.	
	8	Would welcome further discussions regarding the code as it has potential to offer a great deal of benefit to members of the Road Transport Forum.	
	9	The current draft is significantly lacking in sufficient MS's for the transport of bobby calves within NZ. In its current form, the code does not go far enough into protecting the welfare of newborn calves.	
	15	Transport of companion animals are well covered by other codes and recommendations. E.g. CoW for cats, and dogs. Therefore, it is the submitters view that companion animals should be excluded from this code.	
	16	There is inconsistency in the wording of the example indicators – some are sentences, some are phrases. While the meaning is clear, consistency would increase the professionalism of the document.	
	17	Concerned with the conditions in which animals are transported across the cook strait. Distressed and pregnant animals are bullied off ferries, and friends have witnessed this occurring to animals with broken limbs.	
	17	States that she has found stock drivers very rude on SH1. When approached about their animals when they have been breaking for lunch, they	

		have been very abusive and lacking compassion. Have seen older stock trucks with slatted sides replaced by newer ones with smaller, higher windows – which make for a hotter vehicle. Believes these newer vehicles should not be allowed for this reason.
	18	It is recommended that NAWAC undertake a significant education campaign outlining the requirements in the code when it comes into law. Note: the three submitters are prepared to utilize resources, communication channels etc available to them to support NAWAC with such a campaign. Submitters also recommend that an ‘easy to use’ guide be developed to enable those with roles and responsibilities to have a greater understanding of what is required of them in relation to the code.
	20	Considers that the old code is superior to this one. Little account seems to have been taken of the impact that transportation has on the animals.
	20	Who will be enforcing the changes and ensuring that they are adhered to and checking up on dogs cats and other small pets in cars or the privately owned horse in a float or horse box?
	20	‘Animals’ can range from aquatic species, to mammalian foetuses and their dams. These species have varying environmental requirements and this should be reflected in the text. There is a lack of mention of poultry or any other bird and nowhere is the transport of bees mentioned. Reference is made to alpacas and lab animals, but not fish or other aquatic species, reptiles or amphibians, emus, ostriches or llamas.
	20	Best practice should be referenced to other areas in appropriate codes.
	20	The previous code of practice for transportation had little wrong with it. Transportation of pregnant is clearly documented in this and should be reproduced in this document. Submitter is confused as to why the water standards have changed for the worse, not better. Some codes do not detail anything in regard to transport of some spp, and considers that this document therefore must include full details.
	21	Recent media release (dated 16 th Oct) stated that ‘Details for the transport of specific animals, such as chickens or pigs are covered by specific codes of welfare for those animals’. NZPork wishes to point out that this is not the case for pigs – the 2005 code contains a section including a MS on pre-transport selection – the coverage in the re-drafted code is likely to be the same.
	25	Injured animals should be tethered so that neither the tethering nor the transit will do them further injury.
	26	Draft is comprehensive, clear and reads well.
	19, 20, 22, 27	Wants code to be more prescriptive instead of outcome based. If difficulties exist around prosecution of offenders, then the solution is to identify and remedy the cause rather than add an additional layer of cost complexity for users. The introduction of example indicators will result in farmers having to compile exhaustive records as an animal welfare risk mitigation measure.
	27	While there can, on occasion, be a need for such indicator information – eg for BCS information, there is too much information here which simple reflects a lack of clarity in the wording of the MS’s. There has also been no cost/benefit analysis to justify this change. Fed farmers would be concerned if this was driven my external pressure by authorities (overseas or otherwise) that NZ has to put in place measures to verify the functioning of our internal animal welfare systems. The move is likely to involve significant costs for animal owners.
	27	Many NZ farms already participate in commercial schemes related to the supply of animals to meat processing companies. Participation in these schemes is dependent on meeting high levels of animal welfare. Suppliers are audited by both customers and third party agencies. Many schemes also cover the transport of animals from farms to processing facilities. The significant and growing participation of operators in these schemes demonstrates compliance with NZ transport related requirements. Suitable schemes should be able to be accredited in respect of the code for transport, and participation in these schemes should be provides in this code as a way of meeting the MS’s.
	27	Code is too long for a legal document – this length will adversely impact upon users. Information included in the Introduction and general information sections and in the 4 appendices is informative, rather than declaratory and should be removed from the document or provided via web links. Some codes of welfare already have sections on transport and repetition within this code should be avoided. ██████████ is pleased to discuss anything relating to their recommendations – ██████████.
	27	A number of the standards in this code cover areas that are already addressed in the ‘stock effluent code of practice’. These requirements should be

		aligned with the other code.
	28	NSEWG is pleased with the code and strongly supports its introduction. Very pleased to see references to standing stock before transport and determining total time off feed.
	30	PIANZ has stated its wish to include transport elements within the CoW for broiler chickens, which is currently being reviewed. This is on the basis that transport is an integral part of the integrated broiler meat industry, and it is seen as appropriate by the industry, and we understand accepted by NAWAC, that transport should be included as part of the broiler code rather than the generic code of welfare for animal transport.
	31	Recently encountered a truck driver load 29 lambs from her farm into a truck and not pull the gate across to divide the pen into halves. She complained to the trucking firm and they said that they would pull the driver over and have him pull the gate across. Submitter looked at MAF website and noted that the only concerns for transporting sheep are in relation to pregnant or injured animals. Deer and emu have specific pen sizes stated but sheep don't. Submitter wonders why this is.

Submission 0 – Submission received late from [REDACTED]

Submission 2 – Agrees with entire document and found it useful.

Submission 6 – Supports code.

*Submission 12 – gives a good account of the effect of long distance transport in cull dairy cows and suggestions for improving the practice. See whole submission for full details

Summary of responses to stakeholder questions

Question	Sub No.	Comment
Question 1	7	Yes – but the CoW should exist as an addition to legally binding welfare regulations that should be positioned under the AWA 1999 and above the Codes of Welfare.
	17	Yes – is evidence that NZ has systems in place to meet (and exceed) international animal welfare requirements.
	18, 24	Yes – in that there is a consistent national requirement for all stakeholders in the production animal supply chain.
	10, 27, 28, 30	Yes – no further comment
	21, 24	Yes – a code is required for transport, to provide more specific details around how the requirements of the Animal Welfare Act may be met.
	11,14, 16, 17, 25	Yes – livestock have a right to humane, safe and injury free transport.
	13	Applauds NZ government for further strengthening the CoW pertaining to transport of animals.
	15	Yes – but only for commercial transport of livestock.
	19	Yes – but Australia recognizes that codes don't work because they are recommendations and not statutory requirements. These submitters stress the requirement for clear direction that eliminate the opportunity for misinterpretation. Prescriptive regulations, such as those in the EU, leave no doubt about how animals should be treated. The law is clear and penalty applied. Prescriptive directions are designed to prevent poor outcomes, as opposed to outcome based codes which can only be prosecuted after the event. NZ, it seems, is taking a more industry focused attitude, which provides a relaxed approach. The MS's are low, general and open to interpretation which permits cruelty pain and suffering to go un-addressed.
	20	Yes – it is important to update the welfare of animals, particularly in transportation, however a summary that refers to the individual species codes could serve just as well, were they to contain the relevant information.
22	No - Does not consider a code of welfare to be necessary in a system that is predominantly based upon liability only for adverse outcomes. Thinks that prescriptive legislation would more likely to yield better animal welfare. Presents further arguments for the use of a prescriptive system (submission 21).	
Question 2		
	7,24,	Yes – but more details standards should be included in other CoWs relating to specific species. For other species that are not covered in separate CoWs, this code should provide full details.
	24	Yes – and ultimately, however the issues are covered, individual companies/people doing the transport must be responsible for implementing their own processes to ensure good practice.
	13	Yes - Agree that the inclusion of pets, laboratory animals and other within the code is beneficial as many of the principles in transporting such animals are also common to farm animals and safeguards for other categories tend to get forgotten.
	16	Yes – but this code tends to concentrate on transport of livestock only – should take into account pets and lab animals within the bulk of the code. One suggestion would be to have separate sections covering these species which could contain specific information in addition to the general MS's and information.

	22	Yes – as long as specific recommendations for selecting, handling and transporting each species are listed.
	20	Yes – but this code needs to cover both livestock and companion animals comprehensively as the newer codes do not include transportation details, but refer the reader to the transport code.
	10, 11, 15, 17, 20	No - The code needs to recognize two tiers of transport of animals. Commercial (transport operators) and day to day transport of pets, working animals etc (private operators). There is a danger that one code for all is written with commercial operators in mind and discounts the private carriage of animals.
	27	No – This code should focus on commercial animals only. Welfare around the non commercial transport of animals should be dealt with in the relevant separate species specific codes.
	27	No - As this code is legally enforceable, it is, in its present form, addressing transport of production animals to cats to sheep to a guinea pig, is unenforceable - it addresses too wide a range of animals.
	27	If the code was changed to address the transport of commercial animals only, the change would remove a raft of legal obligations and compliance costs around animal transport from other individuals while maintaining obligations around commercial transport. The inclusion of other animals (non commercial) with potential expenses and legal ramifications is not something that should be entered into lightly. The Fed Farmers believes that this step, of including other non commercial animals in the code, should be justified by NAWAC as to what cost benefit and other analyses have been carried out to support the move. Even if non commercial transport is not covered by a code, prosecutions for animals cruelty in this area can still be made under sections 9-11 and section 23 of the Act. Furthermore, if anyone fails to carry out their duties they can be prosecuted under sections 12-14.
	11	No - Livestock are less economically valuable than privately owned pets and so require a separate code of welfare regulating the transport of these animals and means of prosecuting when these animals arrive at their destination injured or damaged.
	11	No - Laboratory animals have no true ownership and are less economically valuable and replaceable.
	19	No - One code for animals used in farming provides a reference point, but submitter prefers to see animal specific areas within the code. It is inconceivable, other than ethically, that you could have the same requirements for lab rats as you would for companion animals, fishing or other animals used in farming.
	21	No specific opinion one way or another in the case of pigs (NZPork) – however the code seems geared towards livestock transport.
Question 3		
	13, 16, 24	Yes - Agree that MS reflect good practice
	24	Yes – and the development of QA programmes and systems for journey planning will encourage some improvement over current practices in some instances.
	16	Yes – and applaud attempts to make them outcome focused but concerned about a number of indicators. Many add nothing to the interpretation of the standards, many repeat what is in the MS and many repeat the outcome if the MS is not met. , some do not related to the MS and there are insufficient indicators for other standards. If indicators are to be used, they should be relevant and their function should be explained more fully.
	10	Are satisfactory.
	11, 22	No - The wording in the document is at best subjective and offers no incentive to apply apart from the threat of prosecution. Does any organization check that the transport company has met the standards along the journey? New technology could be used to ensure that codes are complied with e.g. scanning, digital imaging, tracking and monitoring, volume monitoring (provides weblink for further info).
	19, 22	No - Do not agree that the MS's in this code will ensure that the physical health and behavioural needs of animals are met. The will not deliver

		best practice. NZ should operate at a RBP level if it is viewed as having animal welfare as a priority. The MS's are much lower than EU standards, which are accepted as world's best practice. There must be one set of standards and they must be the best standards possible to meet best practice otherwise the code will be licence to allow foreseeable and unnecessary suffering.
	7	No - Some MS's are insufficient in content to ensure welfare of the animal and seem to reflect current practices, rather than good practices.
	20	No – do not agree.
Question 4		
	7, 19,	Yes - Generally agree with RBP's – however, as listed, thinks that some RBP's should become MS's.
	24	Yes – but note that improvement outcomes will only follow if individual operators implement the next step (i.e. implement their own processes to ensure good practice).
	16	Yes – agree.
	22	The RBPs, if put into practice, would be quite suitable for ensuring reasonable levels of animal welfare in transport. However, they are not mandatory. Operators are not likely to do more than their legal requirements.
	20	No – do not agree
Question 5		
	20	Yes – by its nature it will change practices – and in some ways will disadvantage the dairy industry and the equine breeding industry. In other ways it is retrograde when compared with the current codes and thus may increase the discomfort of animals in transit rather than improve it.
	22	Yes – to the detriment of animal welfare. E.g. operators are now able to use prodders on sheep.
	24	Yes – if implemented though individual operator codes of practice or operational plans, this code should lead to improved skills for transport operators. Often situations where animal welfare is compromised could be avoided by a better overall approach to managing risk, as proposed in this code.
	11	Yes – hopefully provide more care and ownership and more compliance.
	13	Yes - If the code is correctly used to support a prosecution under the Animal Welfare Act, the code will change existing practices.
	18	MS2 (f) – this will impact on being able to use four deck stock crates for large lambs. MS3 (e) – very few loading/unloading facilities on farms or at sale yards have shelter or shade installed MS4 (d) – will increase documentation requirements (with no benefits to animal welfare) MS14 – may increase costs to farmers and general public who carry dogs on open vehicles such as light trucks.
	7	Unlikely, unless the low binding regulations (or other forms of legislation) are developed and implemented.
	19	The code should change existing arrangements by raising standards – which are currently unacceptable. The code should be strong and clearly defined.
	10	The effects on existing arrangements are unlikely to be large, other than those that require new regulation.
	X	A code should formalize MS's and expectations. There are some MS's and indicators which are not going to be easily interpreted and hence, not be a thorough basis for educating and informing the public and about animal transport.
Question 6		
	7	No, not relevant
	10, 16	No – we do not envisage increased compliance costs.
	11	If this is a legally enforceable code, rather than one which can be used in one a prosecution, then yes it is worth having. It is unclear to submitter what in the code the transport operators have to comply with.
	19	Yes – but submitter believes that expenditure on ensuring a reduction in animal suffering is justified. The costs of compliance must not have any

		preferred consideration over the effectiveness of legislation and must never outweigh animal welfare. Industry will always cry poor, but in reality, best practice is about increasing efficiency and productivity and so commitment to animal welfare will enhance the bottom line.
	20	Yes - Will increase costs and for some dairy farmers, the proposed code is inconsistent and places a heavy burden on farmers who move pregnant cows off to grazing during the dry period and return them to the home farm just before calving. This is a major part of farm management, especially on the south island.
	24	Yes - The requirement for improved skills in the transport industry will result in more comprehensive operators will incur additional expenses for tuition as well as 'downtime' for drivers to undertake study. These costs will inevitably be passed on to the farmer.
	24	Upgrading farm facilities for loading/unloading will be an additional cost for some farmers.
	27	Where defined measures are included in compliance systems, increase record keeping requirements follow, and hence increased costs. The Act does not require the prosecution to prove that the defendant intended to commit an offence – meaning that documented history of compliance could be needed to mount a defense. Also, any such defense would require that the multitude of 'example indicators' is complied with. These 2 factors will require farmers to develop and maintain exhaustive records.
	24	Requiring transport companies to increase their level of planning and documentation will incur increased costs, which again, will be passed on to the farmer.
	24	RBP (d) – This is unworkable for the dairy industry. It is also inconsistent with OIE recommendations that animals should not be transported in the final 10% of pregnancy. Although this RBP does not have the legal standing of an MS, Dairy NZ wishes to state that this RBP is impossible to meet under current industry management systems for 2 reasons, i) farm ownership contracts generally take effect at the end of a milking season at which time herds are transported to new farms. This generally happens when most spring calving cows are in the last trimester of pregnancy. This RBP would hence prevent animals being transferred between farms at the time of contract changeovers. 2) a large proportion of dairy farmers winter cows off the area that they graze during the milking season (milking platform) and cows are transported to areas of crop or pasture for winter management to protect soils and pastures on the milking platform. The cows must return to the milking platform, sometimes within 2-3 weeks of calving. Very few problems occur during this process and dairy farmers already acknowledge and manage the risks of pregnant cow transport very well. See submission 24 for further details.
	24	Limitations on the acceptability of the animal for transport will also limit farmers options for animal management, especially those in low health/poor condition. Transporting low body condition score animals to alternative crops and grazing will require timelines and forward planning so that stock can be moved before conditions become too poor. The option to transport cull animals to processing plants and saleyards will be increasingly limited and farmers will need access to alternative means of disposal.
Question 7		
	10, 16	Yes - Benefits in perception of NZ environment. The agriculture and export industries define this and it is in our best interests to have a CoW for these animals.
	16	Yes - Publication and publicity about the CoW should raise awareness of the needs of animals during transport. Road transport may be the only time that the livestock is visible to many NZders and can thus act as a window into the livestock industries. It is hence important that it is done well.
	19	Yes - If the code is of a high enough standard and properly enforced, it will be positive for the reputation of NZ. Should this draft be adopted as the Code, we believe there will not be many benefits for animal welfare. The MS should be replaced by RBP and must be legally enforceable – to raise to levels of EU welfare and set a standard for other nations to aspire to.
	20	Yes – we believe if written to encompass all the species that 'animal' includes then this may improve the welfare of some animals that are in transit, however, there needs to be cross referencing to the species specific codes of welfare to ensure compliance, when greater detail may be

		available, or include in this code as it is in the present code.
	24	Yes - Improved transport outcomes for animals, including fewer animals going down transport during transport and having to be destroyed on arrival, and stock arriving in better condition. Key limitation is whether the code can promote change at farm level, such as ensuring that loading facilities are up to standard.
	25	Yes - This code has the added effect of reducing the number of animals in transit on roadways and railways. This should have the follow on effect of reducing populations of bovine, ovine and porcine animals, which will enhance the quality of human life and the environment. It will also impact the slaughterhouses, in that the decrease in volume will shut them down.
	22	No - Benefits to operators only – particularly in the sense that they have a defense for complying with a MS that is very low and open to interpretation.
	7	No - Does not see much benefit for animals, but may be some benefit for the transport or meat industry in NZ. The emphasis of the CoW is on voluntary, and not enforced, compliance. Gives commercial transport operators a free hand in terms of assessing their own conveyances and animals. Code does not insist on any formal training.
	11,16	Are there sufficient personnel and funds to manage and enforce this code?
Question 8		
	7	Prolonged transport of very young or very pregnant or diseased animals may become publicly exposed as socially unacceptable yet not formally discouraged by NAWAC and NZ government.
	X,	The fact that MS's can be used as evidence in a court of law should encourage good practice.
	19	Support for improving animal welfare can have wider flow on effects for society including a greater appreciation of the environment and animals' places within it, better market opportunities, and a further improvement in the brand of NZ. New Zealanders are becoming more discerning about the food they buy and its point or origin. They don't want to be told that there are high standards when in fact there are not. Eventually poor and unacceptable transport will be exposed and this has the potential to ruin the reputation of the nation and its markets.
	20	We should always bear in mind that 'a society can be judged by its treatment of animals'.
	22	A trend is emerging towards the acceptance of animal products from countries with high standards of welfare. If NZ chooses to lower its standards of welfare in transportation it is likely to face a drop in reputation, and a drop in export income.
	27	Any expectation that all MS's be met as part of the measurement around specific standards is to be deplored. It adds nothing except cost to the identified reason for including indicators.
	24	The problems that this code seeks to address are largely 'under the radar' that are not of a great concern to those outside the industry. Thus, this code should not have impacts on NZ society, economy or the environment.