

APPENDIX SIX: SUBMISSIONS ON 2017 ANIMAL WELFARE REGULATORY PROPOSALS

There is strong support (between 82 to 99%) for 40 of the 46 proposals being progressed in this paper from industry, advocacy groups and the general public

There are only six proposals where there are still divergent views

Proposals	Supported by	Opposed by
Limitations on the use of electronic prodders	Industry groups	Advocacy groups
Restrictions on transportation of lame sheep	Advocacy	Beef + Lamb
Prohibiting docking of cows tails	Industry Veterinarians Advocacy groups	Some individual farmers
Use of pain relief during disbudding and dehorning of cattle	Veterinarians Bovine Dairy Sector Advocacy groups	Beef + Lamb Some individual farmers
Prohibiting the docking of dogs tails	Advocacy groups Veterinarians	New Zealand Council of Docked Breeds. Advocateship of Purebred Dog Breeders
Restriction on removing dogs dew claws.	Advocacy groups Veterinarians	New Zealand Council of Docked Breeds. Advocateship of Purebred Dog Breeders

Summary of submissions on 2017 proposals

The proposals being progressed in 2017 are a subset of proposals consulted on in “MPI Discussion Paper No: 2016/12: Proposed Animal Welfare Regulations: Care & Conduct and Surgical and Painful Procedures”

The following broad groups were used to categorise the submissions received. These categories are shown in the pie graphs and discussion of the submissions on the proposals in the following tables:

- Support = Expresses support for the proposal as it is.
- Stronger = Comments on the proposal, suggests a stronger wording or penalty, or more or stronger regulation in the general area.
- Weaker = Comments on the proposal, suggests a weaker wording, lower penalty, or less regulation in the general area.
- Oppose = Opposes proposal - may either prefer no regulation/status quo or may only state opposition to proposal without mentioning what they might like instead.
- DNC = Does not comment directly on the proposal - this will include where general comment that stronger regulations are required but there has been no specific comment on the proposal itself.

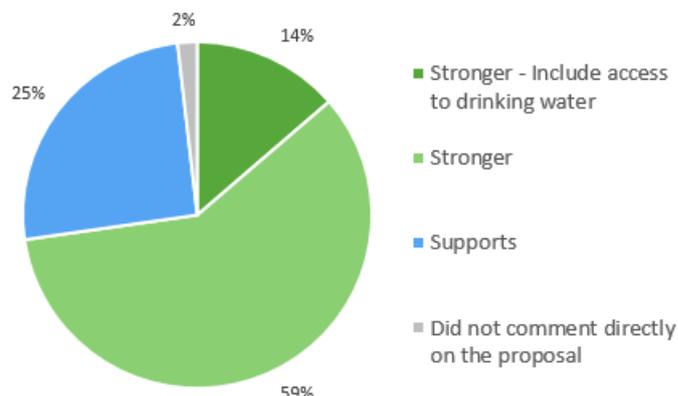
Proposed \$300 infringements

1. All Animals – Injuries from collars or tethers (110 submissions)

Proposal: Use of a collar, and/or a tether, must not cause cuts, abrasions, swelling, restrict breathing or panting.

Links to goat and horse tethering, links to dog muzzling, access to shade and dry sleeping quarters, and heat stress in vehicles.

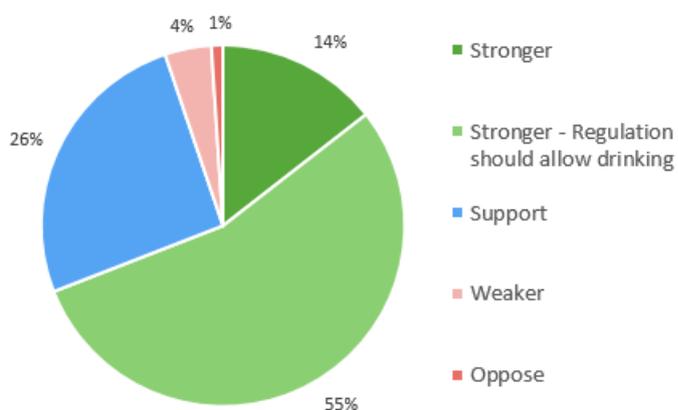
- No submissions opposed regulation in this area.
- The vast majority supported the regulation as worded or asked for stronger wording.
- Suggestions for stronger wording included the extension of the regulation to all animals, followed by access to drinking water.
- A number of submitters considered that there should be a time limit applied to the period a dog can be tethered. The time limit identified as appropriate was given as 8 hours.



2. Dogs – Muzzling a dog (97 submissions)

Proposal: Muzzling a dog must not cause cuts, abrasions, swelling, or restrict breathing and must allow panting.

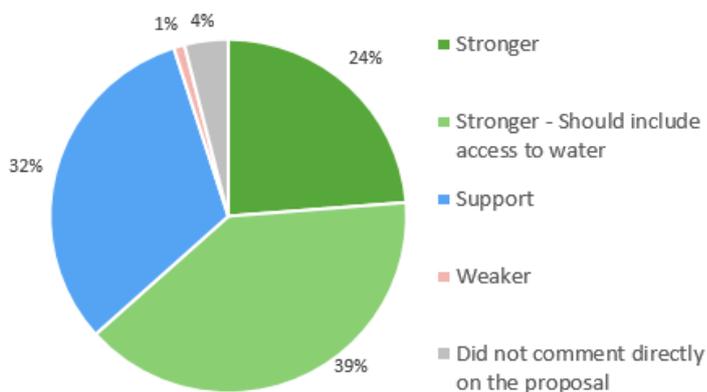
- The vast majority supported the regulation or asked for stronger wording.
- The most common stronger position requested that the regulation be extended to allow a dog to drink when muzzled.
- A number of submitters put forward scenarios where tight muzzling will be necessary. These included veterinary examinations to prevent an anxious dog from biting, or muzzling captured dangerous dogs.
- The single submitter opposed to the regulation thought there were low complaints in the area, and responsible owners are always careful in the treatment of their dogs.
- A strong theme in the submissions was the need to ensure dogs were not left unattended while muzzled.



3. Dogs – Dry and shaded shelter (101 submissions)

Proposal: Dogs confined to an area where they are habitually kept must have access at all times to a fully shaded and dry area for resting and sleeping.

- The vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested that the regulation require access to palatable water.
- This was followed by submitters requesting the regulation include a maximum period that a dog can be restricted to a kennel or tether – especially on a sunny day with no shade.
- Industry organisations supported the regulation but submitted that there would be situations where this would be difficult to apply – such as extreme weather events, or overnight mustering.

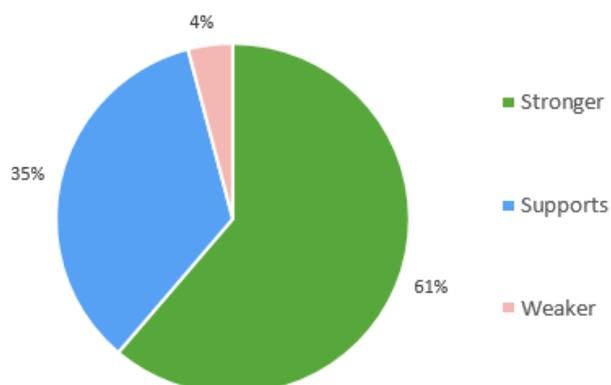


4. Dogs – Dogs left in vehicles (102 submissions)

Proposal: A person leaving a dog in a vehicle must ensure the dog does not display symptoms consistent with heat stress such as any or a combination of:

1. Hyperventilation;
2. Excessive panting;
3. Excessive drooling;
4. Lethargy, weakness, or collapse; and
5. Non-responsive to attempt to check a dog's alertness

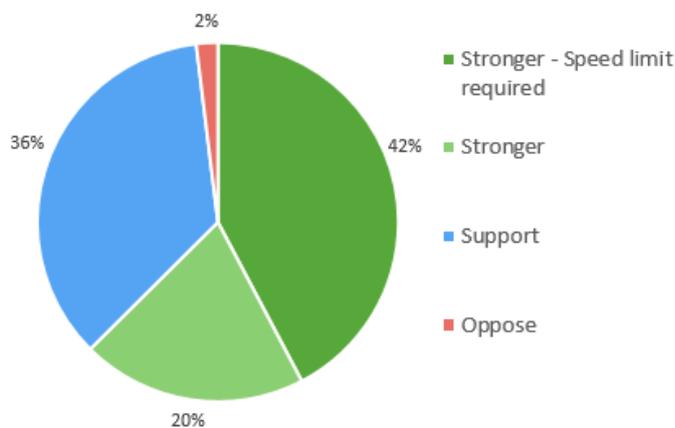
- The vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested for the penalty to be a prosecutable regulation offence.
- Most industry organisations submitted that this should remain an infringement offence to allow more serious cases to be prosecuted under the Act.
- A strong theme in the submissions was a concern that the listed symptoms were too broad, and left too much up to interpretation by people who were not specialists in breed types or behaviours.
- Submitters opposed to the regulation thought that this would not be a deterrent to offending, and that education would also need to accompany the regulation to be effective.



5. Dogs – Secured on moving vehicles (104 submissions)

Proposal: Dogs on moving vehicles on public roads must be secured in a way that prevents them from falling off, except for working dogs which may be unsecured on a vehicle while working.

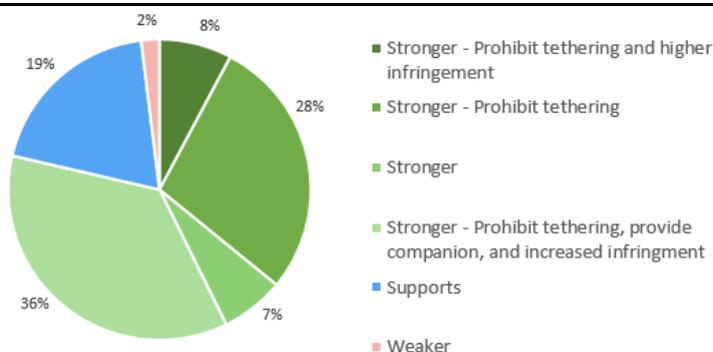
- The vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested a maximum speed limit to be set for when a dog is on a moving vehicle. The most common speed limit given was 40km/h for vehicles carrying unsecured working dogs.
- Another large group of submitters wanted to see the regulation extended to dogs unsecured on private property to include working dogs.
- A number of submitters showed concern with the ability to enforce the regulation, and that animal welfare inspectors would need stronger enforcement powers for it to make a difference.
- Farming industry organisations supported the regulation as it recognised common farm practice. Advocacy and Veterinary organisations thought the regulation could be stronger in terms of working dogs, but most accepted the exception due to farm practice.



6. Goats – Tethering requirements (103 submissions)

Proposal: Tethered goats must have constant access to food, water, and shelter.

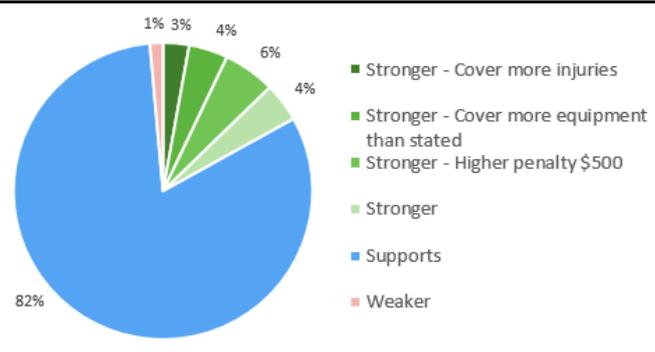
- No submissions opposed regulation in this area.
- About a quarter of submitters supported the regulation as worded.
- A majority of submitters opposed the concept that goats should be allowed to be tethered permanently, and that the infringement fine should be higher.
- Submissions asking for stronger wording requested for goats to be provided with a companion animal.
- Many submitters argued that goats are not lawn mowers, they are very social animals that need more food than just grass, and should be provided with appropriate shelter. Tethering goats did not meet their needs.



7. Horses and donkeys – Injuries from equipment such as halter, head ropes, and saddles. (71 submissions)

Proposal: The use of halters, head ropes, saddles and other equipment must not cause cuts, abrasions, or swelling.

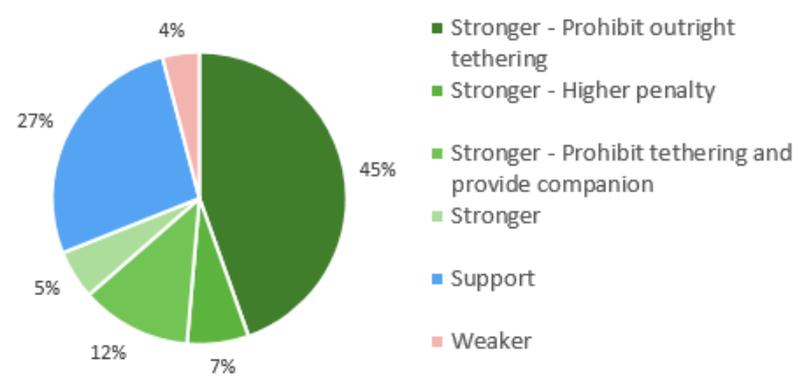
- The vast majority supported this regulation as worded.
- A small number of submitters called for a higher infringement fine.
- It was suggested that the regulation should include the removal of equipment when it is not being used, as well as bruising and pinching to be included as an injury.
- Recommended that the definition of equipment include twitched, tack and mouth gags.



8. Horses and donkeys – Tethering requirements (73 submissions)

Proposal: Tethered horses and donkeys must have constant access to water, food, and shelter.

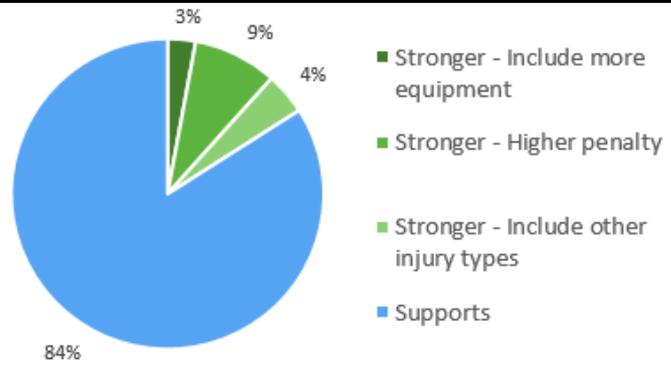
- The vast majority supported the regulation as worded or asked for stronger wording.
- A large number of submitters requested that tethering be prohibited outright, followed by the request that companion animals should be required.
- A number of submitters also requested that shelter be specified further, and that it was important to differentiate between constantly tethered animals and animals tethered for a short amount of time.
- A small number of submitters called for a higher infringement fee.



9. Llama and alpaca – Injuries from equipment such as halters, head ropes, and packs (69 submissions)

Proposal: The use of halters, head ropes, packs and other equipment on llama and alpaca must not cause cuts, abrasions, or swelling.

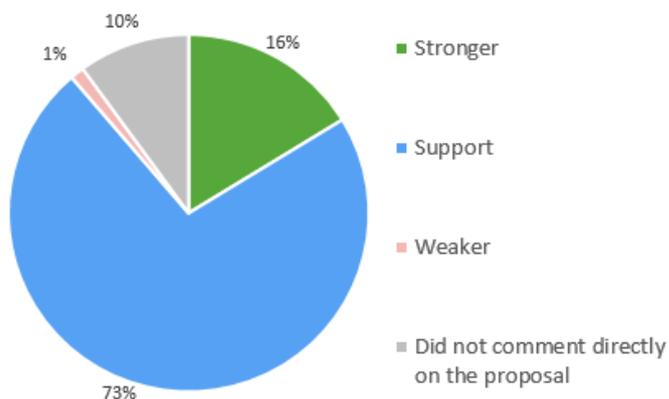
- The vast majority supported this regulation as worded.
- A number of submitters supported a higher infringement fine.
- Submissions asking for stronger wording also requested that cuts and abrasions be broadened to include hair loss which can be significantly painful to an animal.
- There was suggestion that the definition of equipment be expanded to include harnesses as well.



10. Pigs – Dry sleeping area (80 submissions)

Pigs must have access to a dry sleeping area

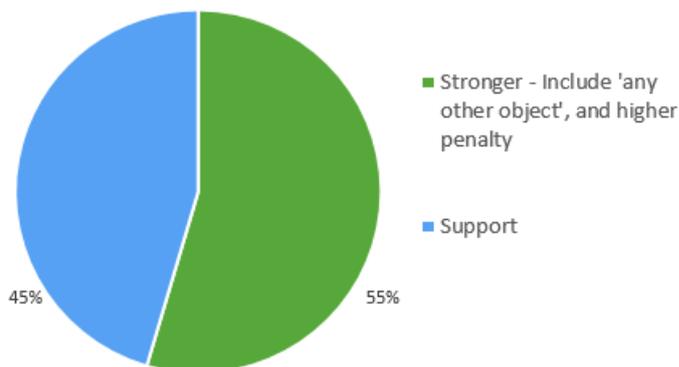
- No submissions opposed regulation in this area.
- The majority supported the regulation as worded or asked for stronger wording.
- Submissions asking for stronger worded related to extending the scope of the regulation to include concepts such as draft free, adequate ventilation and sanitation.



11. Cattle - Milk stimulation (77 submissions)

Proposal: Prohibit stimulating milk let-down by inserting water or air into a cow's vagina.

- No submissions opposed regulation in this area.
- The most common stronger position requested including 'any other object' and/or hands.
- A smaller number felt a stronger penalty should apply.



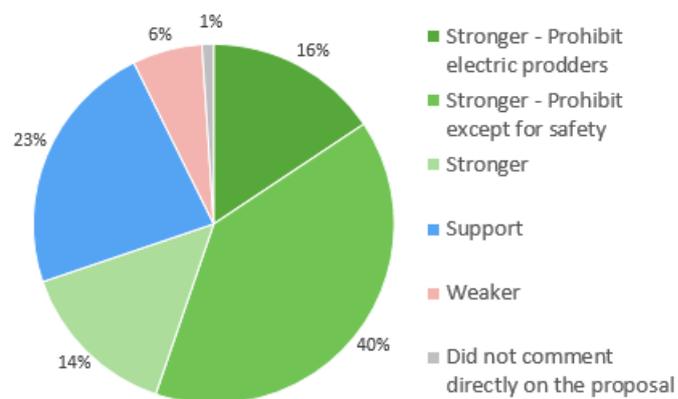
Proposed \$500 infringements

12. All animals - Electric prodders (95 submissions)

Proposal: Electric prodders may only be used on:

1. Cattle over 100kg;
2. Cattle over 100kg and other animals in a circus where the safety of the handler is at risk; or;
3. Cattle over 100kg, and other animals, in a commercial slaughter premises:
 - i. Where the safety of the handler is at risk;
 - ii. When loading a stunning pen.

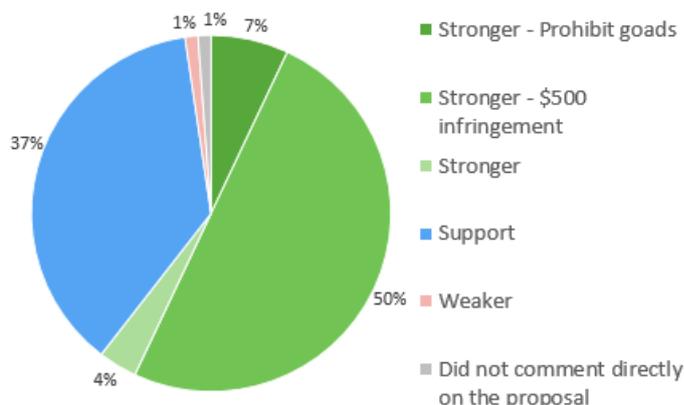
- No submissions opposed regulation in this area.
- The vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested prohibiting electric prodders except to protect the safety of handlers. This was followed by outright prohibition. Other stronger positions included no exceptions for circuses, rodeos, or slaughterhouses.
- Submissions asking for weaker wording requested allowing use on more animal species (most commonly large pigs), providing a more general safety exception, or allowing wider use when loading stock trucks.



13. All animals - Use of goads (86 submissions)

Proposal: Prohibit using a goad to prod an animal in the udder, anus, vulva, scrotum or eyes.

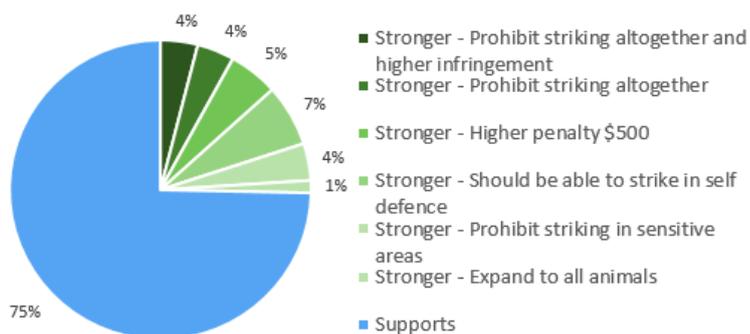
- No submissions opposed regulation in this area.
- The vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested a higher penalty of \$500 as the act was seen as deliberate. This was followed by outright prohibition. A number also suggested broadening the range of areas covered and/or including hands as well as goads.
- The submissions asking for weaker wording requested the offence be only for 'deliberate' acts.



14. Horses and donkeys – Striking in the head (75 submissions)

Proposal: Prohibit striking a horse around the head with a whip, lead or any other object.

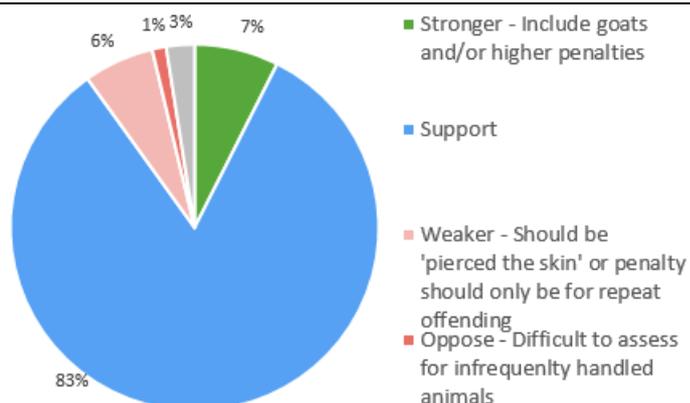
- The majority supported the regulation as worded.
- A common stronger position proposed that a horse should not be hit in any area at all with a whip or a lead as it will cause distress. This was followed by the request that this regulation include striking the horse in the genitals or sensitive areas.
- A number of submitters requested that this regulation should expand to all animals.
- Submissions asking for weaker wording requested that there be an allowance to strike a horse in the interest of self-defence.
- A large number of submitters believed the infringement fine should be higher.



15. Cattle, sheep, and goats with ingrown horns (81 submissions)

Proposal: Failure to treat an ingrown horn that is touching skin or eye.

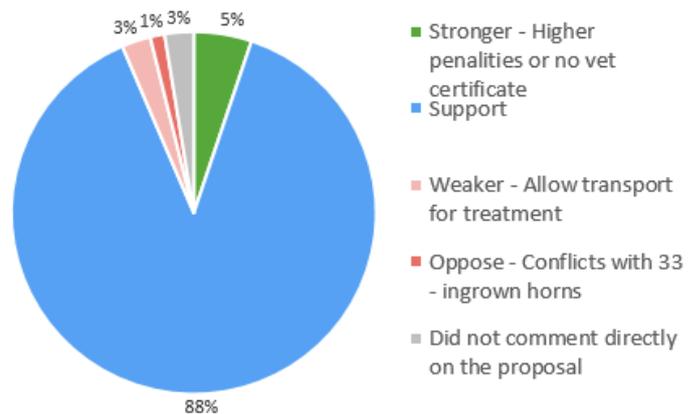
- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested goats be included and/or a higher penalty.
- Submissions asking for weaker wording either requested the offence be for failure to treat an ingrown horn 'piercing the skin' instead of 'touching' or for penalties only to apply to repeat offenders.
- Submitters opposed to the regulation noted the difficulties that arise when animals are mustered only once or twice a year and the treatment difficulties if the rules around dehorning are made more restrictive.



16. Stock transport – Animals with ingrown horns (78 submissions)

Proposal: An animal with an ingrown horn that is touching skin or eye must not be transported, except when certified fit for transport by a veterinarian.

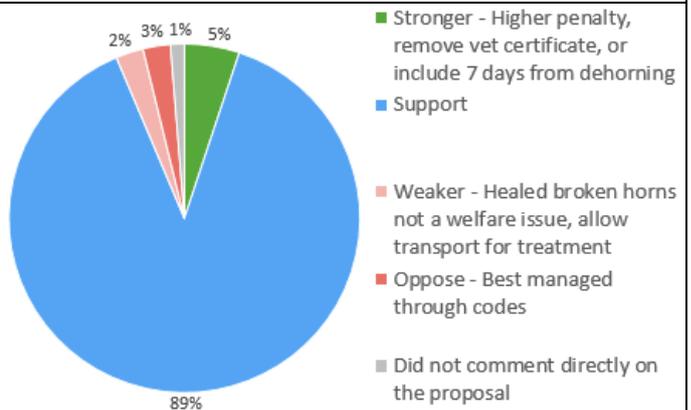
- The majority supported the regulation as worded.
- The most common stronger position requested a higher penalty and/or no allowance for veterinarians to certify animals fit for transport.
- The most common weaker position requested that the transport of animals for treatment be allowed without a veterinary certificate.
- A number of submitters commented on the interaction of this regulation with 33. *Failure to treat an ingrown horn.*



17. Stock transport – Animals with bleeding horns or antlers (79 submissions)

Proposal: An animal with a bleeding or broken horn or antler must not be transported, except when certified fit for transport by a veterinarian.

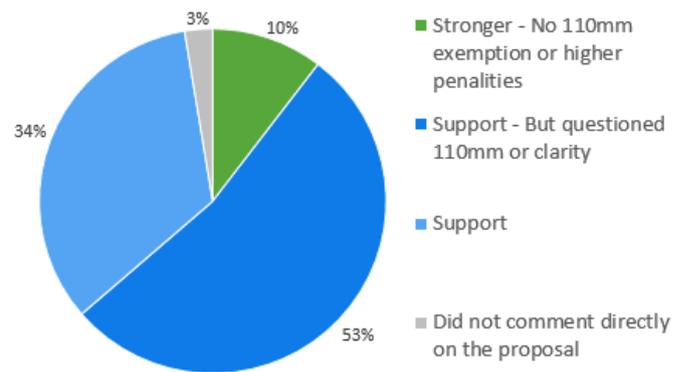
- The majority supported the regulation as worded.
- The most common stronger position requested a higher penalty and/or no allowance for veterinarians to certify animals fit for transport and/or including not transporting animals until a week after dehorning.
- The most common weaker position noted that broken but healed horns should not be captured and/or requested that that transport of animals for treatment be allowed without a veterinary certificate.
- Submitters opposed to the regulation thought this issue is best left in code of welfare.



18. Stock transport – Animals with long horns or antlers (77 submissions)

Proposal: Transport of animals with long horns or antlers greater than 110mm must not cause injury to themselves or other animals.

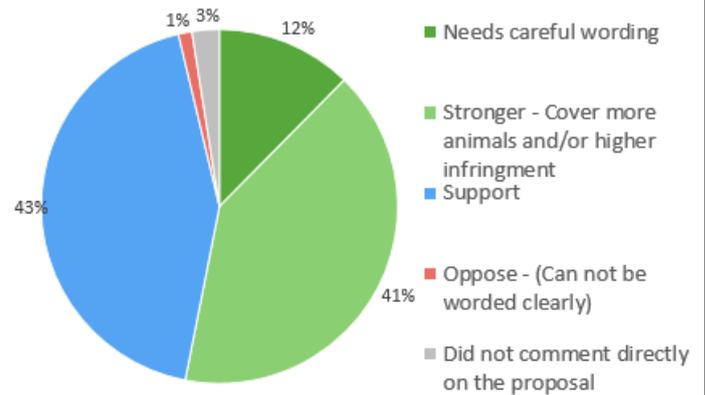
- The majority supported the regulation. However, most also questioned the basis for the 110 millimetres, how it was arrived at, whether it applied to horns or just antlers, how it should be measured, and whether it was necessary.
- The most common stronger position requested no 110mm allowance and just to focus on outcomes – no injuries to or from horns/antlers. A number of submitters also asked for higher penalties and that deer in velvet antler not be transported.
- No submitters directly opposed the regulation though a number noted it lacked clarity and could be misinterpreted.



19 & 20. Stock transport – back rub and injuries in transport (81 submissions) Split into two proposals 19 and 20

Proposal: Transport of cattle, deer, sheep, goats, and pigs must not result in cuts or abrasions.

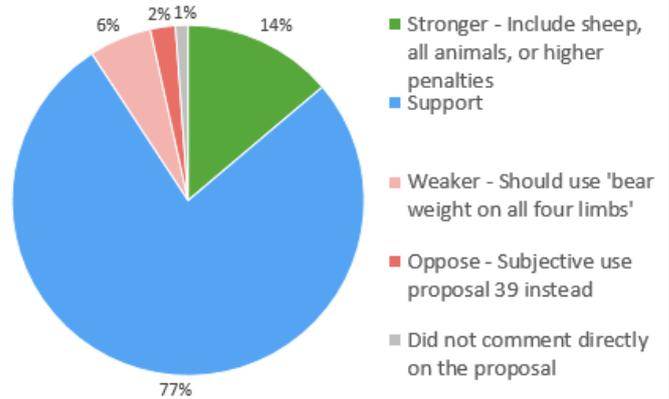
- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested all animals be covered and a higher penalty of \$500 or more.
- A number of submitters considered that the offence needed careful wording to avoid capturing minor scrapes and/or to ensure prosecutions can be taken for severe injuries. Most were supportive but some opposed regulation as they could not see how it could be worded clearly enough to be suitable for regulation.



21a. Stock transport – Lameness cattle, deer, pigs, and goats (87 submissions) now combined with 21b below

Proposal: A cattle beast, deer, pig, or goat that has a lameness score of two must not be transported, except when certified fit for transport by a veterinarian. A cattle beast, deer, pig, or goat that has a lameness score of three must not be transported.

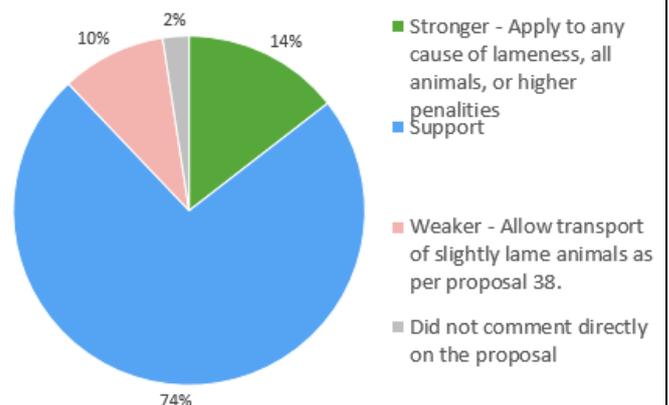
- The majority supported the intent of the regulation but there was plenty of discussion about the interaction with regulation 39, how to clearly define lameness, and which animals should be covered.
- The most common stronger position requested the inclusion of sheep, all animals or higher penalties. Other stronger positions included not allowing veterinarians to certify animals fit for transport or requiring veterinarians to certify every lame animal prior to transport.
- Submissions asking for weaker wording included allowing transport for treatment, only prohibiting lameness score 3, excluding goats, and using 'bear weight on all four limbs' instead.
- Submitters opposed to the regulation thought the lameness scale too subjective and regulation 39 should be used instead.



21b. Stock transport – Animals that cannot bear weight evenly due to injury (83 submissions) combined with 21a above

Proposal: A cattle beast, sheep, deer, pig, or goat that has suffered a physical injury or defect that means it cannot bear weight evenly on all four legs should not be transported, except when certified fit for transport by a veterinarian.

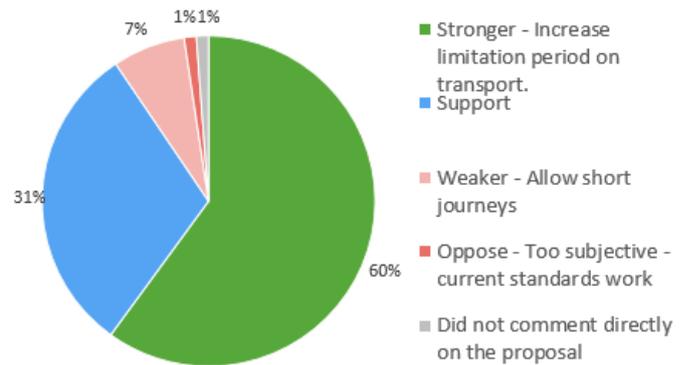
- No submissions opposed regulation in this area, but some had concerns about clarity and practicality.
- The majority supported the intent of the regulation but there was plenty of discussion about the interaction with regulation 38 and how best to define lameness.
- The most common stronger position requested the inclusion of all causes of lameness, all animals, or higher penalties. Other stronger positions included prohibiting transport or requiring veterinarians to certify every lame animal prior to transport.
- Submissions asking for weaker wording requested the wording 'able to bear weight on all four limbs' which allows for transport of minor lameness and animals with healed injuries. Transport for treatment also mentioned.



22. Stock transport – Pregnant animals (85 submissions)

Proposal: Prohibit transporting a cattle beast, sheep, deer, pig, or goat that is likely to give birth during transport, or within 24 hours of arrival at a commercial slaughter premises, except when certified fit for transport by a veterinarian.

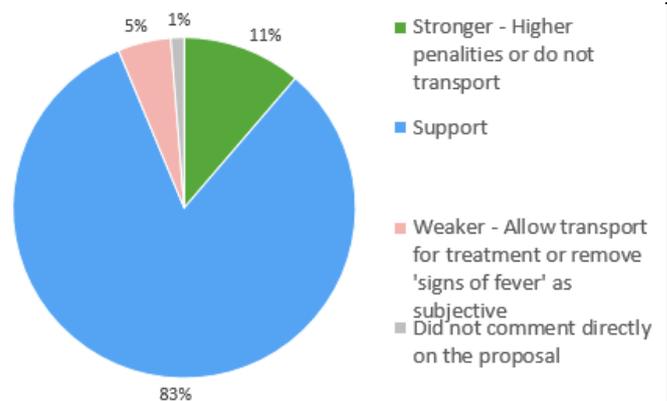
- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested a longer time period when the offence would apply (48hrs) or pregnant animals could not be transported (last week, 10%, 20%, or last 3rd of gestation). Other positions included higher penalties, or also covering birth within 24 hours of arrival at saleyards or on farm.
- Submissions asking for weaker wording requested exceptions for pre-mature births, for short journeys such as from the run-off block back to the home farm where animal can give birth in better facilities, or for unrecorded (i.e. unintended) pregnancies particularly in hoggets and deer.
- Opposed submitters had concerns that the regulation would be too subjective, or that some instances such as premature births are difficult to assess and beyond the farmers control.



23. Stock transport – Animals with injured or diseased udders (80 submissions)

Proposal: An animal with a burst, distended, or necrotic udder or an animal with mastitis where there are signs of fever or the udder is hot, red, swollen or discharging, or necrotic must not be transported, except when certified fit for transport by a veterinarian.

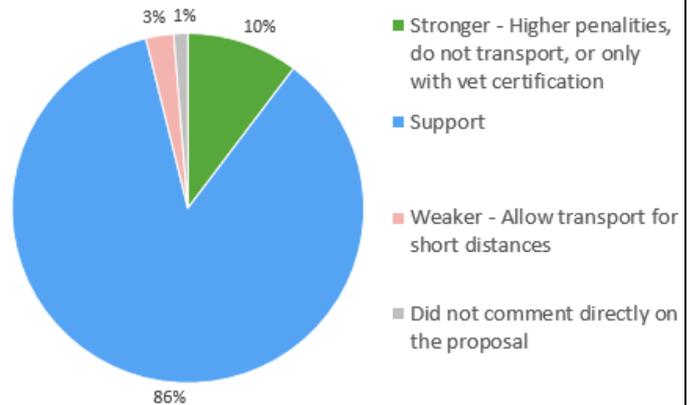
- The vast majority supported the regulation as worded or asked for stronger wording.
- Stronger positions requested not allowing transport of such animals at all and higher penalties.
- Submissions asking for weaker wording suggested removing 'signs of fever' as subjective, noted the difficulty of identifying udder issues in mobs of sheep, or suggested that transport to the works was the most practical end for an animal in this condition.



24. Stock transport – Cattle, sheep, and goats with cancer eye (78 submissions)

Proposal: A cattle beast or sheep with a cancer eye greater than 2cm in diameter and not confined to the eye, or eyelid, or that is bleeding or discharging must not be transported, except when certified fit for transport by a veterinarian.

- The vast majority supported the regulation as worded or asked for stronger wording.
- Stronger positions requested not allowing transport of such animals at all, or requiring a veterinary certificate for any cancer eye, and/or higher penalties. Also noted that the 2cm cut-off relates to cattle and a smaller cut-off is probably more appropriate for sheep.
- Submitters asking for weaker wording requested the ability to transport short distances for treatment and also raised concerns about practicality of veterinary certification when animals are mustered for transport once or twice per year to be brought back to the home farm.



25 & 32. Pigs – Tail docking (75 submissions)

Proposal:

Tail docking – under 7 days:

May be undertaken by anyone

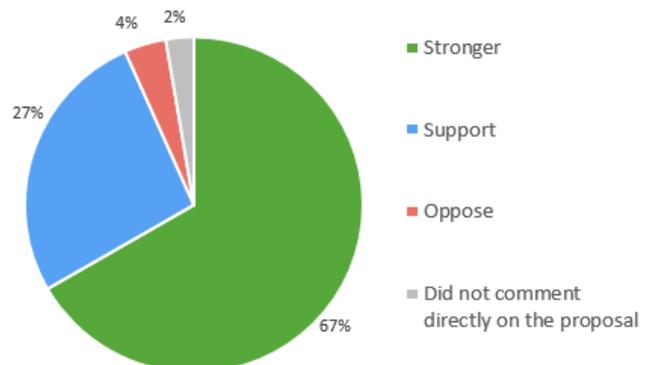
The procedure must create a clear cut and not tear or crush the tissue.

Tail docking – over 7 days:

Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian

Pain relief must be used at the time of the procedure.

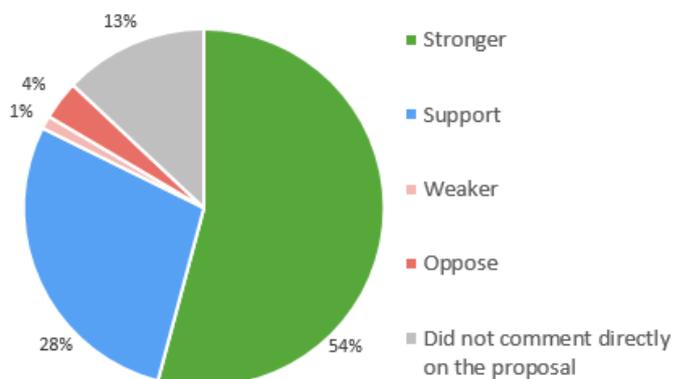
- The majority supported the regulation, although most asked for stronger wording.
- The most common stronger position requested the regulation be limited to therapeutic reasons, and to be limited to being performed by a veterinarian.
- A small number of submitters requested the regulation to be amended to allow tail docking to be performed by anyone at the time of weaning, and to remove wording about crush/tears as these may be advantageous to reduce haemorrhages.



26. Pigs - Lying space for grower pigs (85 submissions)

Proposal: Grower pigs housed inside on non-litter systems such as slatted or solid floors must have lying space of at least: Area (m²) per pig = 0.03 x liveweight^{0.67} (kg)

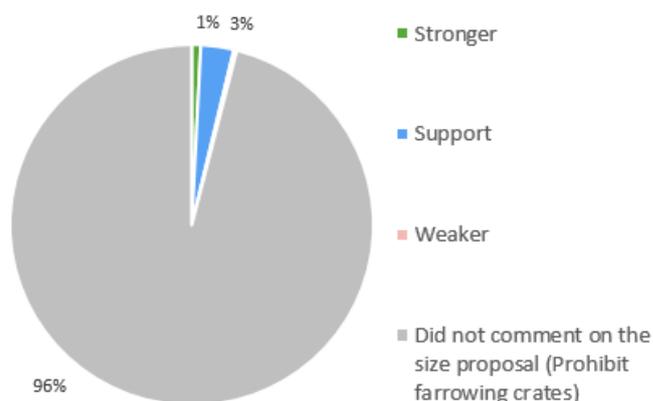
- The majority supported the regulation as worded or asked for stronger wording.
- Stronger positions requested referring to *area* or *space allowance* in the regulation wording rather than 'lying space'.
- Submitters also noted a required correction in the calculation of the live weight formula as printed in the consultation document.
- Three submitters opposed the regulation on the basis that pigs should not be housed inside.



27. Pigs – Size of farrowing crates (751 submissions)

Proposal: Prohibit keeping a sow in a farrowing crate where the sow cannot avoid touching the top of the crate, or touching both sides of the crate simultaneously, or touching the front and the back of the crate simultaneously.

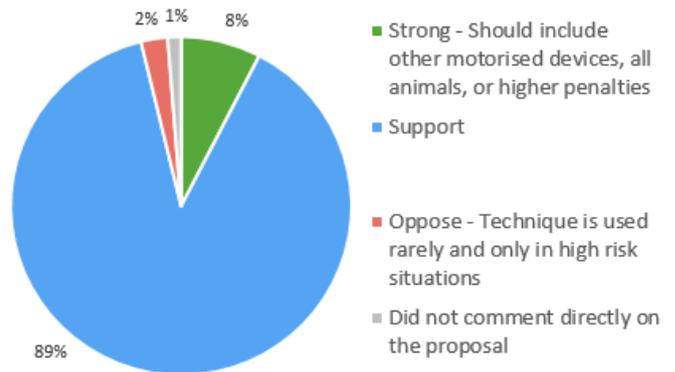
- The majority did not comment on the regulation itself, but sought an outright prohibition on the use of farrowing crates.
- Submitters who commented on the regulation specifically, either supported it as worded or requested the wording of the current minimum standard to be used instead.
- A general theme in the submissions was a support for the regulation to be a regulatory offence.



28. Cattle and sheep – vehicular traction in calving and lambing (79 submissions)

Proposal: Prohibit using a moving vehicle to provide traction in calving or lambing.

- The vast majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested a higher penalty. Other positions also asked for other motorised devices and for all animals to be included.
- Opposition to the regulation stated that the technique is rarely used, but sometimes necessary in an emergency and should not be regulated.



29. Cattle and sheep – castration and shortening of the scrotum (83 submissions)

Proposal:

Castration and shortening of the scrotum (under 6 months of age):

May be undertaken by any person.

Conventional rubber rings must only be used for this procedure.

Castration and shortening of the scrotum (over 6 months of age):

Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

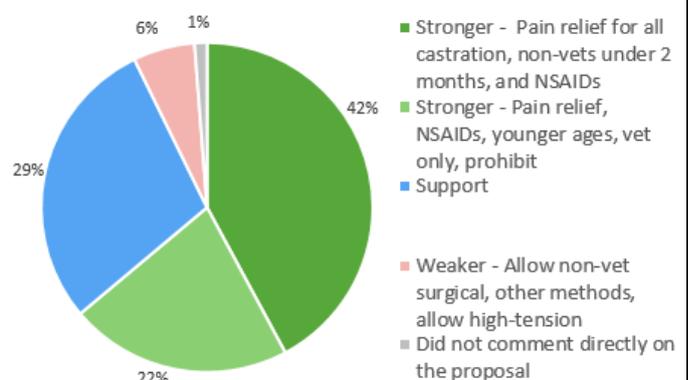
Pain relief must be used at the time of the procedure.

Surgical castration (at any age):

Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.

Pain relief must be used at the time of the procedure.

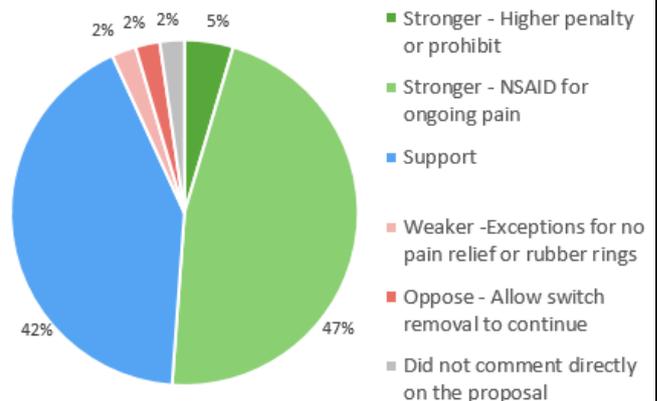
- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested the pain relief for all castration including non-steroidal anti-inflammatory drugs (NSAIDs) for ongoing pain, and that non-veterinarians could only castrate animals using rubber rings under 2 months of age.
- Other stronger positions also advocated for differing pain relief and training requirements, age limits (6, 8, 12 weeks), method restrictions or prohibition.
- Submissions asking for weaker wording requested that non-veterinarians be allowed to surgically castrate, to ban high tension bands rather than prescribe rubber rings, to allow for other methods to be developed, or to allow the use of high tension bands with pain relief.
- A number of submitters were concerned about practicality if this high volume procedure became too restricted.



30. Cattle – Tail docking (88 submissions)

Proposal: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.
May only be performed for therapeutic reasons
Pain relief must be used at the time of the procedure.

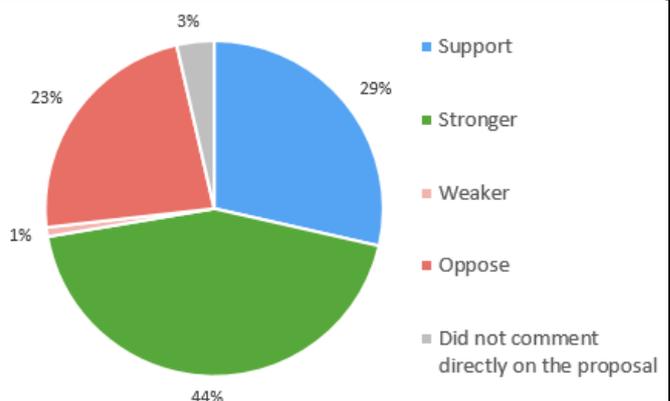
- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested that non-steroidal anti-inflammatory drugs (NSAIDs) be required for ongoing pain relief. Other stronger positions requested a higher penalty or tightening the meaning of 'therapeutic'.
- Submissions asking for weaker wording requested an exception to allow non-veterinarians to treat tail injuries with rubber rings or to allow the procedure to be performed with no pain relief under 4 days of age.
- Submitters opposed to the regulation want to allow switch removal to continue.



31. Cattle – Disbudding (112 submissions)

Proposal: May be performed by any person
Pain relief must be used at the time of the procedure.
(Disbudding is the destruction, by any method, of the free-floating immature horn tissue from which the horns of an animal subsequently develop.)

- The majority supported the regulation or asked for stronger wording.
- The most common stronger position requested that the procedure should be done by a vet, accredited or trained operator and not just 'anyone' as proposed. This was followed by mandatory post-operative pain relief.
- Some industry organisations supported the regulation but noted the need for a lead in time to upskill operators and ensure systems to allow non-veterinarians too effectively and efficiently access pain relief.
- A number of submitters opposed the regulation on the basis that some disbudding methods did not cause undue pain and therefore pain relief was unnecessary.
- Other submitters opposing the regulation, including other industry organisations, noted that pain relief may cause more problems, that there needs to be considerable upskilling before this regulation could be implemented, the need for better relationships between farmers and vets, and increased costs on the farmers.
- Submitters representing the veterinarian sector differed on whether this procedure, when performed on sheep and cattle, should be done by a veterinarian / veterinarian technician or whether it was appropriate to be done by a skilled non-veterinarian operators. They agreed that for goats this should be a veterinarian only procedure due to a goat's susceptibility to anaesthesia and sensitive skull.



25 & 32. Pigs – Tail docking (75 submissions)

Proposal:

Tail docking – under 7 days:

May be undertaken by anyone

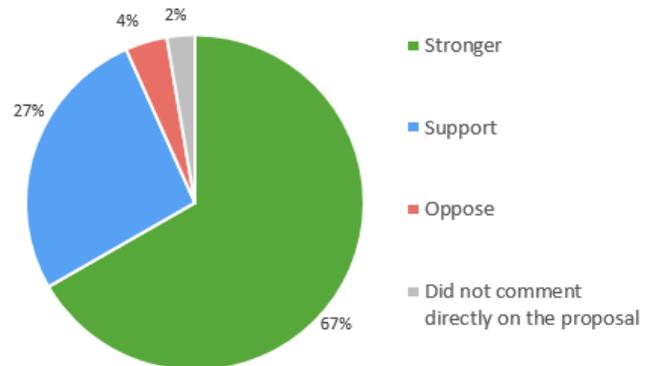
The procedure must create a clear cut and not tear or crush the tissue.

Tail docking – over 7 days:

Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian

Pain relief must be used at the time of the procedure.

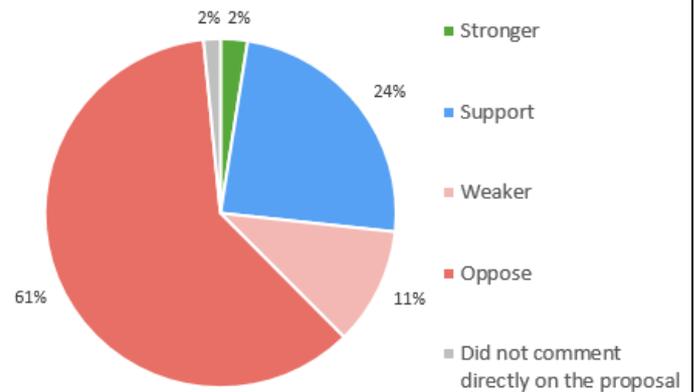
- The majority supported the regulation, although most asked for stronger wording.
- The most common stronger position requested the regulation be limited to therapeutic reasons, and to be limited to being performed by a veterinarian.
- A small number of submitters requested the regulation to be amended to allow tail docking to be performed by anyone at the time of weaning, and to remove wording about crush/tears as these may be advantageous to reduce haemorrhages.



33. Dogs – tail docking (303 submissions)

Proposal: Must be performed by a veterinarian or a veterinary student under the direct supervision of a veterinarian.
Must only be performed for therapeutic reasons.
Pain relief must be used at the time of the procedure.

- The majority opposed the regulation as worded.
- Submitters opposed to the regulation considered that:
 - Banding/docking is a preventative measure against risk of injury;
 - The procedure does not cause puppies under the age of 4 days old any pain or distress (or any level of pain is minimal).
 - The status quo should be retained under the Accredited Banding Scheme
- Submitters who supported the regulation generally do not agree with docking tails for aesthetic reasons, and believe that dogs' tails have a function in terms of balance and communication with other dogs and humans.



34. Dogs - dew claws (279 submissions)

Proposal:

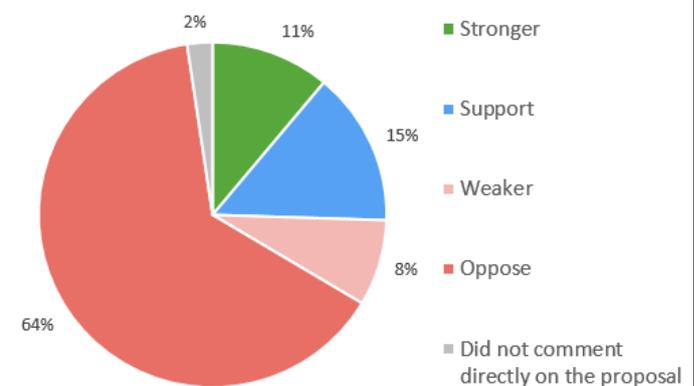
Front limb dew claw removal and articulated (jointed) hind limb dew claw removal:

Must be performed by a veterinary or a veterinary student under the direct supervision of a veterinarian;
Must only be performed for therapeutic reasons; and
Pain relief must be used at the time of the procedure.

Hind limb dew claws: non-articulated (greater than or equal to four days of age):

Must be performed by a veterinarian or a veterinary student under supervision; and
Pain relief must be used at the time of the procedure

- The majority opposed the regulation as worded as they believed removal of dew claws is in the best interest of dogs to prevent injury.
- Submitters opposed to the regulation claim working dogs are at higher risk of injury from having dew claws.
- An industry organisation suggested that non-veterinarians be trained under a best practice scheme.
- The most common stronger position requested that both front and hind limb claws be removed by a vet.



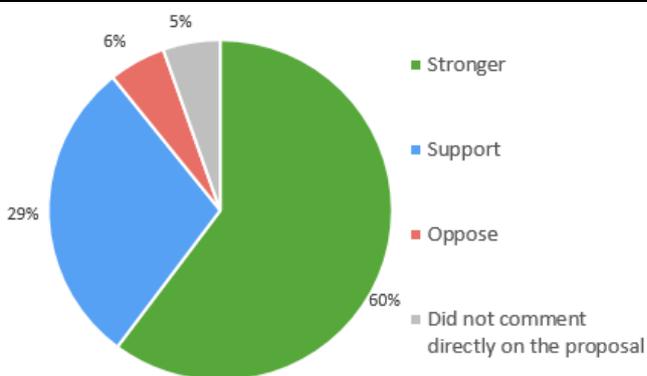
35. Cattle – Dehorning (93 submissions)

Proposal: May be performed by any person

Pain relief must be used at the time of the procedure

(Dehorning is the removal of the whole horns from an animal by amputation.)

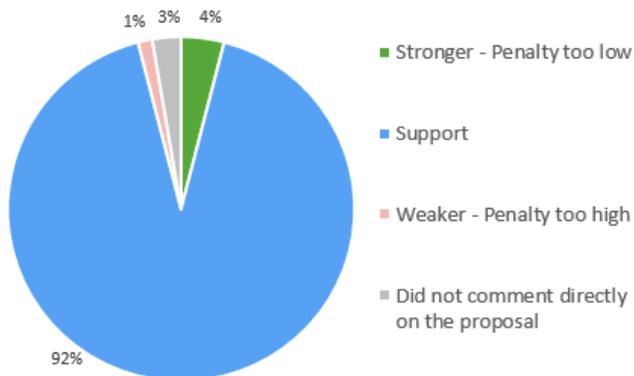
- The majority supported the regulation as worded or asked for stronger wording.
- The most common stronger position requested that the procedure should be done by a veterinarian only. This was followed by a request that the regulation specifically state that it must be undertaken by an accredited or trained operator and not just ‘anyone’ as proposed. There was also strong support for post-operative pain relief from these submitters.
- Submitters representing dairy industry organisations supported the regulation but noted the need for a lead in time.
- A number of submitters, including other industry organisations, opposed the regulation and noted that pain relief may cause more problems, that there needs to be considerable upskilling before this regulation could be implemented, the need for better relationships between farmers and vets, and increased costs on the farmers. They also considered that removing the tip of the horn (tipping) should be allowed at any age without pain relief.
- As with disbudding, it was proposed by a number of submitters that the procedure on goats should be veterinarian only due to a goat’s susceptibility to anaesthesia and sensitive skull.
- A small number of submitters called for tipping to be included within the definition of a dehorning due to the potential for this procedure to cause pain.



36. Sheep – Mulesing (75 submissions)

Proposal: Prohibit mulesing

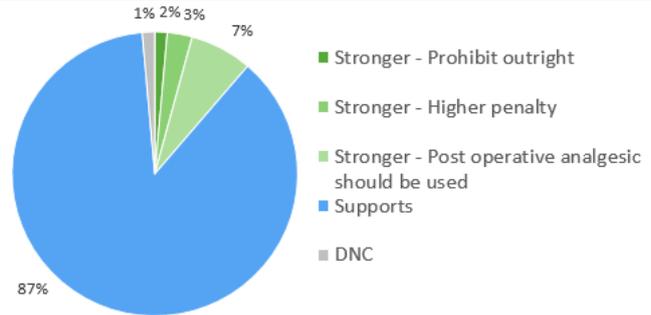
- The vast majority supported the regulation as worded.
- A small number of submitters asking for stronger wording requested a higher penalty or tightening the prohibition to exclude ‘therapeutic’.
- Some concern about the level of the penalty was expressed, particularly the inclusion of a criminal conviction.



37. Horses – Castration (71 submissions)

Proposal: Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian. Pain relief must be used at the time of the procedure.

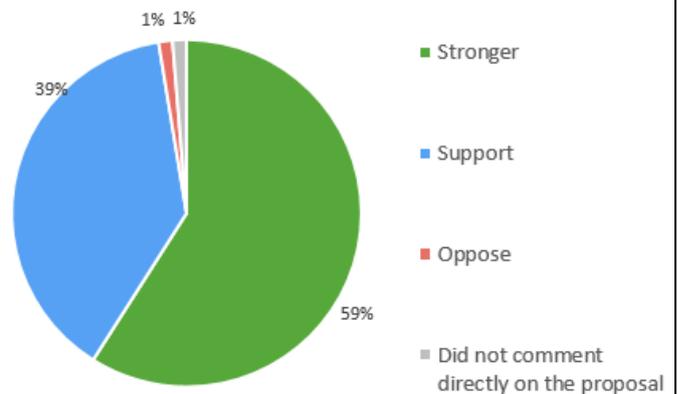
- No submissions opposed regulation in this area.
- The most common stronger position requested the use of a post-operative analgesic be made mandatory. This was followed by requests for a higher penalty.
- A small number of submitters requested that the practice be prohibited outright.



38. Pigs – Castration (78 submissions)

Proposal: Must be performed by a veterinarian or veterinary student under the direct supervision of a veterinarian. Pain relief must be used at the time of the procedure.

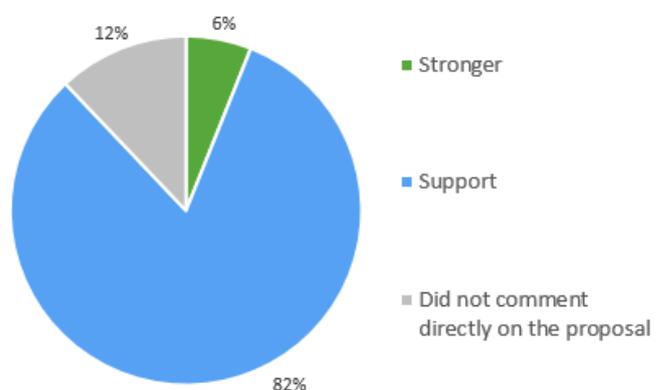
- The majority supported the regulation as worded or asked for stronger wording.
- Submitters who supported the regulation did so because of the opinion that castration is a painful and stressful procedure with potential for complications.
- The most common stronger position requested that a non-steroidal anti-inflammatory drug or analgesic gel also be required during the procedure, and that non-use would result in an infringement fee.



39. Pigs – Dry sow stalls (83 submissions)

Proposal: Dry sow stalls must not be used.

- The majority supported the regulation as worded.
- Stronger positions requested that the wording be better defined to strengthen enforceability, and/or for the regulation to be placed into the main Act as an offence.
- A small number of submissions were recorded as 'DNC' where the submitter supported the regulation in one submission but in another requested the removal of the regulations regarding factory farmed animals.

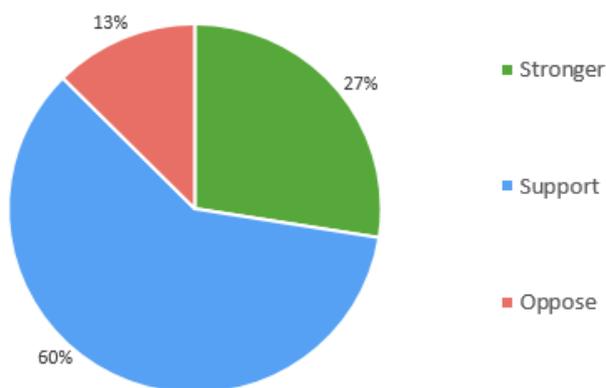


40. Layer Hens - transitional dates to prohibit the use of conventional cages (40 submissions)

Proposal:

1. Hens must have the opportunity to express a range of normal behaviours. These include, but are not limited to nesting, perching, scratching, ground pecking, and dustbathing.
2. Any cage installed prior to 31 December 1999 must be replaced with a housing system that meets the requirements specified in (a) by 31 December 2018.
3. Any cage installed prior to 31 December 2001 must be replaced with a housing system that meets the requirements specified in (a) by 31 December 2020.
4. All cages must be replaced with a housing system that meets the requirements specified in (a) by 31 December 2022.
5. Any housing system installed from 7 December 2012 must meet the requirements specified in (a).

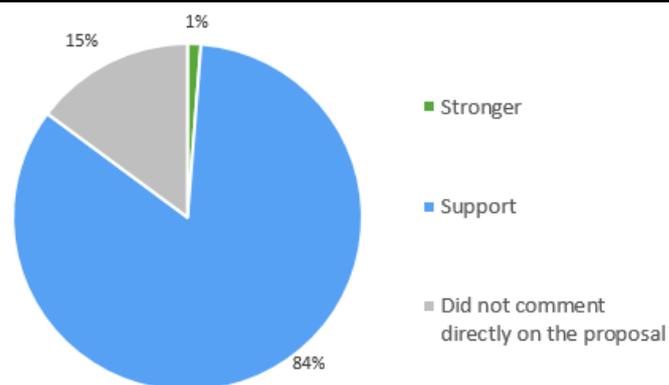
- The vast majority supported the regulation as worded or asked for stronger wording.
- Submissions asking for stronger wording requested a prohibition of colony cages and a review of factory farming practice. Many of these submissions related generally to the expression of behaviours in hens in cages, but did not comment on the regulation specifically.
- A number of submitters requested the wording of the regulation be clarified, including further defining what constitutes normal behaviours.
- A number of submitters were concerned that the current state would be difficult to enforce.
- There were 715 submissions that did not directly comment on the proposal, but asked for cages for chickens, or all regulations relating to factory farming to be removed.



41. Layer hens – prohibit induced moulting of layer hens (81 submissions)

Proposal: Prohibit induced moulting of layer hens

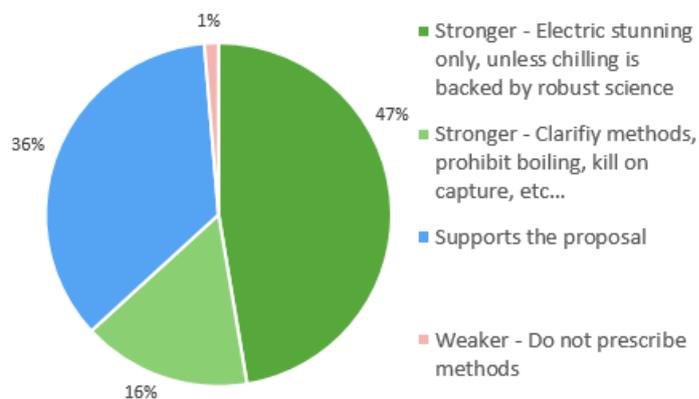
- The majority supported the regulation as worded.
- Submitters who supported the regulation thought it was sufficiently clear and precise to be enforced and that the penalty was appropriate.
- A small number of submissions were recorded as 'DNC' where the submitter supported the regulation in one submission but in another requested the removal of the regulations regarding factory farmed animals.



42. Crabs, rock lobster, and crayfish – insensible before being killed (76 submissions)

Proposal: Crabs, rock lobster, and crayfish that are captured but not imminently destroyed, must be chilled to 4 °C or less, or be electrically stunned, or be otherwise rendered insensible before being killed.

- The majority supported the regulation or asked for stronger wording.
- The most common stronger position requested that only electrical stunning be permitted unless robust science supported chilling as effective. Other stronger positions questioned other methods of rendering insensible, suggested an explicit prohibition on boiling alive, or that all crustaceans should be killed on capture.
- A submission requested that methods of rendering insensible are not prescribed.



43. Rodeos – fireworks (720 submissions)

Proposal: Fireworks, pyrotechnics, and gas fired explosions of any type must not be used at rodeos.

- The majority did not comment on the use of fireworks at rodeos but asked for rodeo to be prohibited.
- Of those that did comment the majority supported the regulation as worded or asked for stronger wording.
- The most common stronger positions requested the regulation be extended to all animal entertainment events and/or tighter restrictions on public use of fireworks, more regulation of rodeo events, or higher penalties for use of fireworks.

