

**Animal Welfare (Llamas and Alpacas) Code of Welfare.
Summary of Submissions from Public Consultation (27 July – 9 September)**

General comments

Submission number	Comments	NAWAC Response
1	<p>The code of welfare that you have produced is excellent and comprehensive, being far more specific than similar reports given in the UK</p> <p>Keeping in step with your aims would there be any objection from you if we in the UK, produce a very similar report having only slight modifications to suit regional differences?</p>	Noted.
2	<p>With these exceptions I think the draft is very detailed and illustrates a good understanding of caring for camelids.</p>	Noted.
4	<p>The code has been discussed by the National Council of the Alpaca Assoc. NZ and we now formally put forward our views concerning the draft document as it relates to alpacas.</p> <p>The AANZ does endorse your efforts to establish a Code of Welfare (Llamas and Alpacas). Setting minimum standards to ensure that the physical health and behavioral needs of alpacas are met can only be good for our industry.</p> <p>There are three main areas of concern:</p> <ol style="list-style-type: none"> 1) When compared to the Sheep and Beef code the code for llamas and alpacas is in many instances far more prescriptive. Why? 2) Alpacas are far more resilient to the extremes of weather compared to sheep and cattle. The current wording of the draft code tends to suggest that alpacas need more care and attention than sheep and beef. We doubt this very much. 3) While alpacas have traditionally been farmed by lifestyle farmers, it is anticipated that eventually these animals will be embraced by mainstream farming. Evidence of this can be seen in the recent establishment of alpaca meat as a product and the intro of processing mills for alpaca fibre. 	Noted. Comments addressed individually below.
7	<p>There is inconsistent use of words and numerals for numbers through the document. While MAF may have its own protocol for codes, normal practice would be to use words for numbers up to and including ten, and numerals for numbers 11 and above. There may be exceptions e.g. in describing Body Condition Scores. We have not specified these through the document.</p> <p>There is inconsistent use of the terms owner, handler and keeper through the document.</p>	<p>Noted. Numerals changed to text where appropriate.</p> <p>Text modified to use 'handler' throughout.</p>

Comments on the code

Section	Submission No.	Comment	NAWAC response
1. Introduction			
1.1 What is the purpose of this COW?	5	<p>I think it would be good to explicitly state the goal is that animals are kept in a high state of welfare. Many camelid owners will not know about the AWA 1999 and how these codes are applied in cases of abuse or neglect.</p> <p>Suggest addition of something like: “The goal of this document is to ensure that all camelids in NZ are kept in the highest state of welfare practical. The code itself is not strictly prescriptive. This allows owners to apply new methods of animal management, so long as they maintain an equivalent or higher state of welfare than is defined in the minimum standards. This allows for the development of the industry over time.”</p>	Disagree – it is the purpose of the code to ensure that animals are maintained in good welfare
	8	<p>The code makes reference, in at least two places, to species related organisations; The New Zealand Llama Association and the Alpaca Association of New Zealand (Section 1.1) and later (Section 10) these two organisations, together with the Llama Association of Australasia New Zealand Branch. We are not convinced that a code of welfare is the appropriate place to promote specific industry bodies.</p>	Agree – reference to specific industry bodies has been removed.
1.2 Who does this code apply to?	5	<p>Do we need to specify the legality of situations where the owner is well-removed from the animals and their daily management? I am thinking specifically of the “investment animal”. Where whole or part-share of an animal is owned remotely – possibly even overseas- by a person who may never see the animal. This is less common but still needs to be covered.</p> <p>What happens to the owner if the person in charge is abusing the animals? When does the owner have liability if they had an honest belief that the animal was well cared for? I know that we don’t want to get into lengthy legal liabilities but some mention of circumstances is worthwhile.</p>	Agree – additional information added in ‘responsibilities’ section
1.4 What happens if I do not follow the MS?	5	<p>“The minimum standards come into force in the case of reported or observed animal abuse, neglect, or mis-treatment. In this case failure to comply with the MS can be used as evidence for the prosecution. Failure to comply with a MS is in itself not a violation so long as the animals are all maintained at a high state of welfare”.</p> <p>The second sentence is potentially dangerous. Abusers could try to weasel-out of their responsibilities. At the same time I know many farmers immediately and reflexively push back any time they feel government regulations are impinging on their operations. I think it would be wonderful if we could find a way to let them know the goal is good</p>	Disagree. The wording in this section is official legal wording. Goal is good farming and good animal welfare.

		farming, and good animal welfare, and they will only be explicitly held to the MS if things go wrong. This is why it might be good to state that complying with all MS would be a good/strong defense in cases where there are accusations of abuse/neglect.	
2. Stockmanship			
2.1 Stockmanship	1	The one small query I have, is the section 2.1 Stockmanship, minimum standard No 1 advice, ie "Camelids must be cared for by a sufficient number of personnel." There is no recommended ratio figure given. As yet there are no published figures in the UK setting a standard man day value for Camelids, but in Australia RIRDC conducted a survey indicating that a value of 8 Std/M/D should be appointed to a camelid, would you concur with this figure?	Disagree. Stockmanship MS is outcome based – sufficient number of personnel must be provided.
	5	Should it read “owners or persons in charge?”	Disagree
2.2 Mustering and Droving			
2.3 Restraint	2	With regard to minimum standards, or best practice, I would like to see a restriction on alpacas being fenced behind electrified tape. This is a high risk for alpacas as with their long necks they tend to graze well under electric tape and when they lift their head and turn to graze elsewhere the tape wraps itself in a circle around their neck. They are not strong enough to break it, cannot escape and the repeated shocks is enough to kill them. I personally know of a number of alpacas who have been killed in this horrific way.	MS states that ‘methods of restraint must be suitable for animal’. RBP has been added that electric fencing is not used.
	2	Also, I think the checking of alpacas wearing halters every 12 hours is far too long, I would like to see that down to every 3-4 hours. (Alpacas have very limited capacity to breathe through the mouth - insufficient for alternative breathing).	Issue is the fitting of halters, not how often they are checked. MS included that they must be designed for camelids and properly fitted. An RBP has been added that camelids are not left unattended with halters.
3. Food and Water			
3.1 Food	5	RBP (g) It is probably worth while to repeat “in cases of wet conditions” for this section.	Disagree
3.2 Water	3	MS No. 5 points (b) & (c) should be deleted. There is no proof that going for more than 3hrs without water while being held in yards, holding facilities or being held for transporting, would be detrimental to an alpacas health. I have never had my herd of alpaca demonstrate undue thirst once released from the yards after they have been	Agree on the deletion.

		held there for an extended length of time. More than 90% of them walk straight past the trough and head for some grass to munch. Maybe you could re-word the (b) and (c) statements to read something like: Water should be supplied to camelids that are being retained in yards or pens if they are to be there for a period of time that would be harmful to their health to be without water.	
	4	Delete MS 5 (c) as it is covered by clause (a). This clause is not found in the code for sheep and beef. If anything camelids can go without water for days, far more than sheep and cattle. Their natural habitat is the South American altiplano where it is common for them to live at altitudes of 15,000 feet. They are exposed to extreme weather and minimal access to shelter.	Agree on the deletion.
	5	I know people are going to complain about the water requirements, probably by saying 'they are camels'. They are not old-world camels and discussing their abilities in regard to life on the altiplano has questionable welfare relevance to NZ. 3 hours without water was based on my previous experience visiting alpacas farms in South Australia, the approximate time it would take before alpaca started to die in extreme temperatures without water. Few places in NZ can reach those temps but it seemed a good number for applying a time without water to be safe. It might also be useful to mention the rapid lethality without water in extreme temperatures. Also, we need to mention in this section that "all alpaca, including cria " need access to water. Nursing cria, even in their first week of life, begin drinking water and require access to it in hot conditions.	Disagree. Time limits have been removed and water provision has been changed to an outcome based standard. Cria are covered under the MS.
	8	The draft standard states (c) "camelids being held for transport should not be without water for periods longer than 3 hours". If this is the case, then are there any implications around access to water during the transport of camelids that need to be addressed, either in this document, or in the "Transport Within New Zealand" Code of Welfare?	Noted. This MS has now been changed to an outcome based standard.
4. Shelter and Shade			
	5	Introduction: "severe and extreme" is a tautology (first para)	Text modified
	3	MS No.6 (b) could read: Camelids must be provided with the means to minimise the effects of heat stress. They do not necessarily require 'shade' if they have been shorn before the hot weather	Disagree.

		comes and plenty of water is available. Alpaca will drink more during the hot weather, sit in streams, climb into troughs, and play in sprinklers, if they are hot and the water is available. Often I have observed they don't want to find shelter from the sun, instead they want to stretch out and bask in it.	
	4	Delete MS 6 (b) – we do not believe there is any evidence to suggest that camelids are more prone to heat stress than sheep or cattle. This clause is not in the sheep and beef cattle code. We also feel it is covered by MS 6 (a)	Disagree. Clause is in sheep and beef code and camelids must have means to minimise heat stress.
	5	General information: It might be useful to mention that extra feed during stormy weather can be very effective at keeping animals warm by stimulating rumen activity which provides for internal heat generation.	Disagree. But text has been added to reflect the requirement for extra feed
5. Housing Facilities			
	5	This is where you first introduce the term “keeper”. This needs to be defined in regards to what they are (owner vs person in charge). That definition needs to be in section 1. I do find the term useful as it makes responsibility clear without potentially-messy issues of ownership. <i>[Note: keeper is defined in the glossary]</i>	Disagree. But text changed to make the use of camelid handlers consistent throughout the code.
6. Animal Handling			
	5	This section has always had an inherent contradiction between “getting it done quickly to minimize stress” and “wait for the animals to settle”. Recommend the code explicitly states that a skilled animal handler can balance these two contradictory indications, reading the mood of the herd to determine if a wait period is simply increasing the stress levels. Camelids observe human behaviour and prefer a “get it done” attitude over a “nervous owner faffing around for hours”. Suggest: “New owners should seek training to increase their confidence in all aspects of animal handling and routine management; the camelids will in many cases be aware of this confidence and will work more easily and calmly”.	Text has been added to reflect this.
7. Behaviour			
	5	MS 9 (a) should read “...companion camelid. ” not animal, since the code goes on to say a non-camelid companion is not sufficient.	Disagree. Discusses companion animal being MS – but companion camelid is RBP.
	5	I admit to being a bit squeamish about mentioning euthanasia in the general	This paragraph has been

		information section. The difficult balancing act of making sure welfare is maintained but not letting people “get away with” stuff is really apparent here. In the course of my work I have seen solitary animals (with non-camelid companions) who appear happy, but also loners who were crazy. I don’t know what the best balance is here.	deleted – but alternative text added noting the need to find a new companion for a suddenly single animal asap.
	8	This states, unequivocally, that camelids must always live with a companion animal and must be raised in the company of other camelids. In the general information section however [paragraph four, page 20] it is stated that “some camelids can be left alone ..” Recommendation: The Federation recommends that this section is rewritten so that it is consistent.	Agree. Text modified.
7.3 Female camelids	5	MS 12 – I’ve heard people express some concern as they work during the day and are not there for most births. To ensure people (who don’t understand the practical legalities) it might be good to state “if an animal is observed to be having birthing difficulties it must be given assistance.”	Disagree. But MS’s modified to ensure that hembra is inspected frequently and assistance is provided if necessary.
	5	Is it appropriate to give indicators of what a normal labor looks like? Or a reference to the NZLA / AANZ for more info?	Disagree.
7.4 Crias	2	"Berzerk alpaca syndrome" (while it is largely a male problem, it can apply to females as well) is also well known in the industry as "Novice Handler Syndrome" (because the issue is with the handling, not the alpaca). This alternative title should be included.	Alternative titles have been included.
	3	MS No. 13 – Colostrum. Would be better if it read: (a) Artificially reared cria should be provided with colostrum, or a suitable substitute, within the first 24 hours of their life to ensure their welfare.	Disagree.
	4	Again the wording for camelids is far more prescriptive than for sheep and beef cattle. We would like MS 13 (a) to read as follows: “Artificially reared cria must receive sufficient colostrum or good quality commercial colostrum substitute to ensure their welfare.” This wording would be similar to the sheep and beef cattle code.	Disagree. But text of this MS has been modified.
7.5 Weaning	3	Recommended Best Practice (a) Could read: (a) Cria should not be weaned from their dams until they have developed the ability to obtain most of their sustenance from pasture or other solids, this may take as long as 24 weeks but has been demonstrated to have occurred sooner in some cria.	Disagree.
	5	General info: The earliest a cria can have a fully-functioning rumen is ~3 months. That places a hard lower limit on weaning age. Should this be referenced? If so it should be with the caveat that 4 months is safer and cria should be monitored to ensure they are thriving.	Disagree.

		Many alpacas operations run at very high stocking levels, and are always looking for a way to increase efficiency. This is an area where for the foreseeable future a hard line may be necessary from a health and welfare standpoint.	
	8	MS 14 (b) states that newly weaned cria “must be provided with adequate high quality familiar feed ...”. The use of the words “high quality” is undefined and therefore subjective and unsuited for inclusion in a minimum standard. Recommendation: MS 14(b) is reworded as “... must be provided with adequate familiar feed ...”	Disagree. But wording of this MS has been modified.
7.6 Shearing	4	Delete MS 15 (a). This is not included in the CoW for sheep and beef. As explained above camelids are far more resilient to extremes of weather than sheep and beef cattle. It is too prescriptive. Who determines which districts are subject to cold or wet weather? I doubt that there is anyone who shears alpacas in winter.	Disagree. But MS about shearing in cold and wet weather has been removed.
	5	Addition of EI: Shearing equipment appropriate for camelids. Most people use sheep gear which work well enough but its best to be specific.	Agree. Added.
	8	MS 15 (b) and (c) essentially say the same thing. Recommendation: MS 15 (b) is deleted.	15 (b) has been deleted.
7.8 Pre transport selection	3	MS 17 - Pre-transport Selection (b) could read (b) Camelids must be fit enough to withstand the journey without suffering unreasonable or unnecessary pain or distress. Alpaca sit while being transported so it is not as important that they be able to stand and bear weight on all four limbs for the duration of the journey. What is more important is that you allow enough space in the vehicle they are being transported in, for all the alpaca to have room to sit.	Disagree. Must be able to bear weight on all four limbs to meet requirements of the transport code.
	6	MS 17 (b) and EI 1 – It is also suggested that camelids presented for transport should be healthy, able to support their weight on four limbs and able to walk unaided. We suggest modifying this passage to include reference to an animal's fitness for transport. i.e. Changing this passage to read “ <i>camelids presented for transport should be fit and healthy, able to support their weight on four limbs and able to walk unaided</i> ”	Disagree. But text already reflects the intent.
	5	RBP (b) – Camelids can be provided clean meadow hay before and during transport.	Noted
	6	RBP (b) - To maintain consistency with terminology common to other codes of welfare it would be beneficial to replace references to “pasture” (for example: Section 7.8 page 28 Recommended, Best Practice B) with “green feed”.	Agree. Text modified to read ‘green feed’.
8. Animal Health, disease, and Injury Control			
8.1 Health	5	MS 18 (d) – At present there is not enough data to back this up as a MS for llamas and	MS states ‘sufficient

		guanacos. Alpacas have a problem but there are no reported cases of hypophosphataemia in llamas and very few llama breeders supplement with Vit D. But considering the importance of Vit D for alpacas I see its need for an MS. This is one place where physiological differences cause a divergence in code requirements.	supplementation' – therefore covers those that do not require supplementation as well. Information included at alpacas are more prone to risk.
	8	MS 18 (b) requires that. In respect of the animal species under discussion, responsible persons "... must be competent at recognising the signs of ill health or injury ...". In the introduction to this section however, it is noted that "It is possible for a very sick camelid to conceal its condition, even from an experienced observer/handler". That being the case the wording of MS 18(b) should be removed Recommendation: That MS 18(b) is removed from the code	Disagree – experienced handlers should know the stoic nature of camelids. But text modified in the introduction.
8.2 Elective Husbandry Procedures	3	8.2 Elective Husbandry Procedures (c) Should read: (c) Pain relief should be used on camelids during removal of teeth. The blunting of the tips of fighting teeth does not appear to affect the alpaca in any way so no pain relief is necessary.	Disagree – but text modified.
	5	RBP (d) – many blunting procedures only take of 5-8mm of enamel and don't seem to cause any pain or distress. A competent practitioner can ensure they font hit innervated tissue in the tooth centre. Unfortunately I have been unable to find any hard numbers for how far they can safely be ground.	Text in this section has been modified.
9. Emergency Humane Destruction			
	5	General Info – Is it worth mentioning that a firearms license is required to use a weapon?	Not relevant to animal welfare.

Response to specific questions

Qn	Submission	Response	NAWAC
Qn1	1. Do you consider a code of welfare for camelids to be necessary? Are there any alternatives which would achieve the same outcome as having a code of welfare? If so what are they?		
	7	A code is definitely necessary, because there are aspects of their biology, husbandry and behaviour that are different from our more traditional species. Because many are held as pets by people who may have fewer stockmanship skills, the welfare of these animals can be at risk. The code can act as an educational tool as long as it is distributed appropriately. The industry association is another source of such information but shouldn't replace a code which sets minimum standards and best practice.	Noted.
	8	We believe that generic formatting of Codes published since the enactment off the Animal Welfare Act has resulted in significant portions of the published Codes containing very similar, if not essentially identical, material. The Federation believes that this process is not conducive to either the best use of taxpayers money or the best use of farmers time in having to read and digest repetitive material. Recommendation: That NAWAC considers whether it is possible to streamline the publication of future Codes of Welfare by having a core common code that is the same across all or most of the species covered and additional sections, specific to particular species, are added as and when required. This approach may result in a reduction in taxpayer investment required to develop and maintain the Codes over time.	Noted.
Qn2	2. Do you agree that the minimum standards in this code are the minimum necessary to ensure that the physical, health, and behavioural needs of camelids will be met? For example, do the minimum standards reflect good practice (not just current practice), current scientific knowledge and available technology? If not, what alternative(s) do you suggest?		
	7	In general we agree, except where specified in our submission.	Noted.
Qn3	3. Do you agree the example indicators given are appropriate to describe how to measure or assess the achievement of the intended outcome of the minimum standards? If not, what alternative(s) do you suggest? Please state your reasons.		
	7	In general we agree, except where specified in our submission.	Noted.
	8	As stated in a previous submission, we submit that the imposition of such requirements is a retrograde step and a movement away from an outcome based code towards one that is more prescriptive. If difficulties exist around the prosecution of offences in respect of animal welfare issues, then the solution is to identify and remedy the cause rather than add an additional layer of cost complexity for users. Federated Farmers further submits that the introduction of such indicators will result in farmers and other stakeholders having to compile exhaustive records as an animal welfare risk mitigation measure. The need for a range of Example indicators for each Minimum Standard is merely symptomatic of poorly	Noted.

		worded Minimum Standards.	
Qn4	4. Do you agree that the recommendations for best practice are appropriate? If not, what alternative(s) do you suggest? Please state your reasons.		
	7	Yes, except where specified in our submission.	Noted.
Qn5	5. Do you think the code would change existing arrangements for the management of camelids? If so, how, and to what extent?		
	7	The code will provide the basis for addressing instances where the welfare of camelids is less than ideal.	Noted.
Qn6	6. Will complying with this code involve costs for you or your business? For example, costs may include converting existing animal facilities or employing new staff.		
	7	No	Noted.
Qn7	7. What barriers do you see to the implementation of the proposed code and how might they be resolved?		
	7	These are species that are relatively new to New Zealand and that are popular as pets on lifestyle blocks. The challenge is to get the information to this somewhat disparate group. The New Zealand Llama Association should be able to help here although not all owners will be members. Publicity in appropriate lifestyle magazines would help.	Noted.
Qn8	8. What benefits do you see from having this code? Benefits may include, for example, increased certainty about animal welfare requirements or market gains.		
	7	It is absolutely essential to have minimum standards and recommended best practice to ensure the welfare of these animals.	Noted.
Qn9	9. What impacts do you think the proposed code will have on New Zealand society, the economy and the environment?		
	7	There are overall benefits for New Zealand in improving the welfare of the country's animals.	Noted.