

## Animal Welfare (Sheep & Beef Cattle) Code of Welfare.

### Summary of Submissions from Public Consultation.

#### General comments

Sub No.	Comment	NAWAC Response
5	This code in some places covers aspects of animal transportation that are covered in more detail in the Transport Code. However the statements are not identical or don't set down the same requirements. While this may seem minor, it is in our view it is essential that both documents are parallel in their requirements concerning livestock transport requirements.	Agree
6	The code of practice suggested by M.A.F. is long overdue due to the soul destroying sight of seeing starving animals dying in the neighboring paddocks. We have been told by the council that there is nothing they can do about it because the problem is not in their jurisdiction. The path of recourse goes something like this, complaint to council, passed on to animal control who then hide behind the 'this is a humane situation' and at that point an unfunded voluntary group (SPCA) have to come to the rescue of a problem that already falls under the laws of the land that the very people who can enforce it can't seem to be bothered with (although when approached they deny the fact). If any member of MAF saw what was going on here then the management draft code on this proof alone, would have a strong recommendation that it be put into law forth with.	Noted
7	A number of suggestions for changes in text have been included in this submission. Refer to submission for complete list of suggestions.	Noted
10	To make it more user-friendly have all Minimum Standards listed at the front (or back) of the publications where they are readily accessible, possibly as well as in their current positions. If they are put at the front or back, there should be a cross-reference to the page number of the relevant section within the code.	Noted, may be considered in review of code formats
11	<p>Chief comment is that during the Code development process, a number of MSs have emerged which are common to more than one Code of Welfare. This is particularly so for the pastoral livestock codes. Suggest that NAWAC could save considerable time and effort in the future, by combining the common MS into a single document, with species/ industry specific MS being issued as separate supplemental documents. Such an approach would not only reduce the size and complexity of the various Codes produced, it would also speed up the consultation process as comment would only be required one ach minimum standard once, rather than every time a code is issued.</p> <p>Suggests that the text needs revision in order to make it more readable, as many of the sentences are lists of variables and factors without any real discussion of their impacts, making it not easy reading at all. This style of writing is not conducive to a document intended for public use.</p>	Noted for future consideration

11 (+ others)	Final formatting and correct numbering of MS and RBPs in code.	Noted
14	I am of the opinion that this COW is “dumbing down” the standards of husbandry, by adopting a lowest “common denominator” approach.	Noted
16	I have found it to generally be a good textbook type document. However I believe it is too long and too detailed to be widely read within the farming community. Also it does not differentiate between the huge range of farm situations and farmer capabilities found in the rural sector. I can elaborate on this in future if required.	Noted
17	<p>This submission supports the attempt which this code represents to address and regulate the welfare aspects of these industries. The potential for suffering which is intrinsic to farming is enormous. All initiatives which increase the consciousness of practitioners in relation to the welfare of the animals they deal with is to be commended. Any reduction in suffering as a consequence of increased awareness makes a difference (potentially huge given the scale of operation), primarily to the animals themselves - while lacking the capacity to complain, there is no longer any substantive scientific challenge to the understanding that the capacity of the higher animals to suffer pain, fear and discomfort is no less than that of our own species. It is also important to the large number of people who have at least some degree of empathy with animals.</p> <p>The submission opposes the nature of the code, in its entirety. Reasons:</p> <ul style="list-style-type: none"> <li>• Lack of precision and quantification – see detailed comments.</li> <li>• Apparent lack of enforceability, administration and system assessment - The Code does not make clear how it will be administered and Minimum Standards enforced nor how the effectiveness of the Code will be assessed.</li> <li>• Lack of information about how practitioners will be made aware of and provided with access to the Code - An effective education / information / dissemination program is therefore considered critical to achieving the stated purpose of the Code, and it is recommended that information about how this will be achieved be made available to the public for comment along with the draft Code itself.</li> <li>• Lack of information about how the Code was developed - The following is considered to be necessary contextual information in the understanding of the Code: do the Minimum Standards ‘lift the bar’ at all? is a continuous upgrading and tightening of the Minimum Standards relating to the welfare of sheep and beef cattle envisaged as the Code is reviewed every 10 years? the part played by scientific study in informing the many statements and assertions contained in the Code, and (especially) the legally relevant Minimum Standards? No studies are referenced in the draft.</li> </ul>	Noted refer to writing code guidelines. These points are considered in the code report which accompanies this code.
18	<p>At present Sections 73 (2) (d), 73 (3) and 73 (4) (a) and (c) of the Animal Welfare Act (the Act) allow the National Animal Welfare Advisory Committee (NAWAC) to set minimum standards which do not meet any of the obligations of the Act which protect animal welfare. These sections were intended to be applied only in exceptional circumstances, but at present have a major influence over the standards in the Codes so that even basic needs are not legally required to be met.</p> <p>We believe that NAWAC has not found the correct balance between animal welfare and economic concerns. The changes suggested below would go some way towards addressing this imbalance.</p>	Noted though s 73 (3) and (4) not relevant to this code

	In many cases the proposed standards are weaker than European standards. While it is arguable that for animal well being the European standards are not high enough, we should at the very least ensure that our standards are as high. If we do not, as well as the harm and distress caused to animals in Aotearoa/NZ we risk harming our international reputation and ultimately international trade by having low animal welfare standards.	
18	The draft Code does not cover the five freedoms (as is stated in appendix vi) as exceptions can be made under section 73.3 of the Act and 73.4 requires NAWAC to have regard to economic, religious and other concerns. We believe that NAWAC) has not found the correct balance between animal welfare and economic concerns. The changes suggested below would go some way towards addressing this imbalance.	Noted though s 73 (3) and (4) not relevant to this code
19	Also support the submission made by MIA in conjunction with M&WNZ. Generalised statements that are unlikely to be objectively substantiated. There are examples where statements are made that need to be challenged as to their justification to be used.	Noted
22	In respect of the minimum standards, we recommend that a number [2,3,4,6,7, 10] are qualified in some way. These standards as written are not fully cognisant of the realities around what is actually achievable under all reasonable circumstances on working farms.	This point has been considered
23	The World Society for the Protection of Animals welcomes the production of a Code of Welfare for sheep and beef cattle.	Noted
24	Supportive of the introduction of a Code of Welfare that documents the high standard of animal welfare practices amongst New Zealand sheep and beef farmers. Also supportive of draft Animal Welfare (Sheep and Beef Cattle) Code of Welfare 2008 being consistent with the draft Animal Welfare (Dairy Cattle) Code.  Supportive of outcome animal welfare standards and best practices. We do not support prescriptive minimum standards or recommended best practices. We believe it is important that it is clear what is expected of owners and persons in charge of sheep and beef cattle and that these requirements are made in plain English. It is also important that the animal welfare concern being addressed by the minimum standard or recommended best practices is clearly outlined in the code of welfare.  More consultation is required around the affect of this code of welfare on the feedlot industry. Contact information provided in submission – see Appendix IV	Noted

Section	Subsection	Submission No.	Comment	NAWAC response
Title page		10	Suggest replace current title with 'Code of Animal Welfare for Sheep and Beef Cattle 2008' for simplicity.	Disagree, consistent with other codes
1. Introduction	1.1	15	This sentence is unclear, and inconsistent in logic..."highest standards" is inconsistent with "equal to min stds"	Agree, change made
	1.2	13	Suggest reword " <i>To whom</i> does this code apply?"	Disagree, consistent with other codes
	1.2	13, 17	Suggests that this wording implies that the owner is NOT responsible - Not absolutely clear – needs clarification.	Disagree, consistent with other codes
	1.3	13	Suggest reword " <i>To which</i> animals does this code apply?"	Disagree, consistent with other codes
	1.4	16	I believe the intention of the Act should be constructive in improving New Zealand animal welfare rather than the negative and destructive policy that has been the case. Any suspected failure in welfare should initiate advisory procedures to rectify the problem and prosecution be held as a last resort. A farmer having to defend him or herself should have independent veterinary and farm advisory input before a case ever reaches prosecution stage. In most cases good advise will correct any issues. Prosecution should only be used where animal managers wilfully continue to ignore the standards of the code.	Noted
	1.4	17	How do they encourage higher standards of animal welfare? What is the incentive?	Noted
	1.5	21	Suggested amendment: While this code is intended to cover most aspects of sheep and beef cattle farming, <i>it should be read in conjunction with</i> other relevant standards and information that are <i>referred to throughout this Code</i> :	Agree, change made
2. Stockmanship and Animal Handling	2 Intro.	13	Suggest that any sighted person can observe them – reword "...an ability to <i>assess them visually</i> , and skill..."	Disagree, observation is more than sight however the sentence is further qualified by " <i>and interpret behaviours</i> "
	2.1 Para 2	11	Replace word 'with' with 'have regarding'	Disagree, but sentence has been rewritten

	2.1	11	Competence – how is this measured?	Noted
	MS 1	3	Delete the word “collectively” and replace with “individually”. The code as it is currently worded, allows an <u>individual</u> person who does not have “the ability, knowledge and competence necessary to maintain the health and welfare of the animals” to care for them. An individual need only know some things about animal husbandry, as long as the individual in conjunction with other people responsible for caring for the animals have the combined knowledge needed. Therefore an incompetent individual, according to this standard, is permitted to care for animals. The standard does not say that the people who collectively have the required knowledge must be all be present together when caring for stock.	Disagree
	MS 1	7	Suggest reword “ ...knowledge, competence <i>and resources</i> necessary to ...”	Disagree, resources covered in other sections
	MS 1	16	The wording of the standard is very loose as a legal requirement. In that what one farmer can handle adequately, another may need help with. And even this will vary under different or extreme conditions. It would be impossible for a farmer to prove that he or she has equalled or exceeded this minimum standard. And unfair for a farmer to be prosecuted for having insufficient personnel during an extreme event when normally the farm is operated well within the code.	Noted
	MS 1	17	Given that this is a minimum standard, should it not be possible, and desirable in terms of information value, to specify a minimum ratio of stockmen to animals? 'collectively' appears to assume that personnel are/will be working collaboratively in a way that means that this health and welfare maintenance happens, but this is not specified as a requirement.	Disagree, code must have regard to various circumstances
	MS 1	22	We do not believe that personnel need to possess “ability, knowledge and competence,” when the use of “ <i>possess the competence</i> ” alone is adequate in the circumstances.	Disagree, this highlights that not just knowledge but practical experience or competence are important
	MS 1	23	How should this standard be achieved? Some consideration of how personnel are selected and trained is needed. Delete “collectively.” Each stockman must be able to cope with most circumstances that will arise.	Noted  Agree, but wording not changed

	RBP	23	These requirements are necessary to achieve the MS.	Agree, included as example indicators
	RPB (b)	11	How is “competence” measured?	Noted
	RPB (b)	15	Include in minimum standards instead of RBP?	Agree, included as example indicators
	RPB (c)	17	Who will inspect the records?	Noted
	GI	7	Not sure why “consistency in behaviour” is here	Agree, deleted
	GI	13, 17	Mixed use of capitals and small letters on bulletpoints.	Agree, corrected
	GI	11	Last paragraph, line 1. Replace word ‘for’ with ‘to practical experience...	Agree, change made
	2.2 Intro, Para 2	11	Change ‘means’ to ‘makes’. On the same line change to ‘Careful and quiet handling <i>can</i> also help improve...	Agree, change made Disagree, NAWAC believes the stronger ‘will’ statement should be included here
	2.2 Intro, Para 2	17	Add words ‘after disturbance’ to the end of this paragraph.	Disagree, though wording changed
	2.2 Intro, Para 4	15	Suggest reworded to read: “... the results of which <i>can be</i> difficult to eliminate... letting them approach novelties, <i>confining in yards at weaning</i> ), especially if undertaken gradually and in <i>short</i> periods... <i>Ideally, animals should be trained to approach handlers when called by providing attractive feed or new pasture after calling.</i> In addition, explain the word ‘novelties’.	Disagree, though wording changed
	MS2 (a)	15	“ <i>minimising</i> ” not measurable	Noted
	MS2 (a)	17	Does this clause provide any more detail than the Animal Protection Act 1999 (as it is intended to)?	Noted
	MS2 (a)	23	This is very general. More detail is needed of what “in such a way” means.	Noted
	MS2 (b)	7	Suggest deleting “..the most...”	Disagree, some sensitivity in all areas prodded
	MS2 (b)	13	This implies electric prodder as opposed to being poked with a stick? Not sure what is meant – if electric there should be an RPB that says such prodders shouldn’t be used on cattle, and an MS that they shouldn’t be used on sheep.	Disagree, is meant for all devices that use physical contact Agree, MS added for sheep and calves

	MS2 (b)	15	What about hitting? Although hitting on the nose should be allowed where necessary for human safety e.g. with recalcitrant stags, bulls.	Agree, but wording not changed
	MS2 (c)	7	Suggest adding "... <i>appropriate force</i> ..."	Disagree
	MS2 (c)	15	" <i>minimum force</i> " not measurable	Disagree
	MS2 (c)	22	Given that Minimum Standards in this code have potential legal impact, we believe that this statement should be amended to allow for a range of circumstances, and so read: "Only the minimum force required <i>in the circumstances</i> must be used when moving sheep or beef cattle"	Disagree
	MS2 (c)	24	Is this requirement covered by (a) and therefore not necessary?	Disagree
	RBP	23	Again, many of these practices are necessary for the MS.	Disagree
	RBP	7	Include an RBP on electric goads/prods	Agree, added
	RBP (a)	9	Animal Handling: Use of waddys, alkathene hoses, etc – these tools are sometimes useful for visual guidance (to be used 'as an extension of the handler's arm' and therefore don't need to be used to make contact with an animal). Their use may offer improved handler safety, particularly when working in the yards with cattle and bulls.	Agree, but covered by current wording
	RBP (a)	11	Stones in a container – is this a common method?	Noted
	RBP (a)	15	Suggest: "When encouraging animals to move preference should be given to <i>positive means i.e. have been trained to move when called which has previously been associated with access to supplementary feed or new pastures. If this is not possible</i> audible or visual measures (e.g. rattles, plastic bags, stones in a container) <i>should be used as opposed to devices...</i> "	Disagree, though wording changed
	RBP (a)	16	Some of the recommended best practices I believe need to be reconsidered. is opposed to devices using physical contact. Yet I believe any farmer getting into pen or paddock with a bull without being armed with a stick or waddy would be an incident waiting for OSH investigation. It is not what is used or carried, but how it is used that is critical.	Noted
	RBP (a)	23	This requirement only for "preference" is weak. Rephrase as "audible or visual measures should be used as opposed to devices that rely on physical contact." It may be acknowledged that this will not always be possible, but can nevertheless be described as best practice.	Agree, sentence has been rewritten
	RBP (c)	17	20-30 minutes to calm down before what?	Disagree
	RBP (d)	5	The statement made that "time spent in the yard should be kept as short as possible" should be amended or removed as it conflicts with a statement	Disagree

			implying the same requirement that appears later in the document concerning standing time pre-transport (on Pg.39).	
	RBP (d)	15	Suggest adding "...possible, <i>except when habituating them (cattle only?) at weaning</i> "	Disagree
	RBP (d)	24	<i>Short as possible</i> is too restrictive and conflicts with (c) above and with minimum holding time before transport. What is the animal welfare concern if food and water is adequate? This RBP is unfair on feedlots.	Disagree, see later feedlot section
	RBP (e)	7	Suggest rephrasing : " should not be <i>crowded so closely that they can't readily</i> move from handlers or other animals <i>when</i> this is likely to contribute to distress <i>or injury.</i> "	Disagree, though wording changed
	RBP (e)	11	Add commas in this sentence.	Agree, commas added
	RBP (e)	13	This is impractical in many cases e.g. most yarding situations and catching pens at shearing.	Disagree
	RBP (e)	15	Approximately half-fill yards	Disagree
	RBP (f)	15	This should be a minimum standard.	Disagree
	RBP (g)	15	Cattle only! How much? What type? It would be unusual not to see some threats, bunting in most mobs of cattle which would be unavoidable.	Disagree
	RBP (g)	16	Suggests holding aggressive animals separately. In practice to isolate aggressive or upset animals singly or in a small group can be more hazardous and leads to greater upset for the animal.	Agree, wording changed
	RBP (g)	21	Suggest reword: "If problems of aggressive <i>animal</i> behaviour occur, <i>the cause of the aggression should be identified, and handling adjusted to reduce or minimise the aggression.</i> " Reasons: When you get and animal or a group of animals show aggressive behaviour it is usually better to either abandon working with them, return them quietly to their paddock and try again at a later date or to only continue with extreme care. For example, sometimes when loading trucks the animals can become unruly even when they are being handled quietly but firmly. Also if animals that are showing aggressive behaviour are drafted from the mob will frequently become even more dangerous.	Disagree, though wording changed
	RBP (h)	7	Suggest reword " certain types of livestock should eb penned separately, e.g. horned from polled cattle, bulls from cows, calves from older cattle."	Disagree
	RBP (h)	15	Suggest reword: " <i>The following should be separated when yarded:</i> horned and polled cattle; bulls and cows; and calves and unfamiliar older cattle."	Disagree



	RBP (h)	21	Suggested reword and " Where possible... to start of statement. Reasons: In normal circumstances separate groups of poled and horned cattle would not be yarded together. However, if an existing cohort of say 10 horned and 10 polled animals were to be yarded, they would normally only be separated if it was intended to hold cattle for an extended period of time.	Disagree
	RBP (h)	23	It is unclear whether this list includes pairs of types that are to be kept separate, or what.	Noted
	RBP (i)	11	Suggest text is changed to read: 'Tails should not be lifted or twisted to <i>make an animal move</i> '.	Disagree, though wording changed
	RBP (i)	23	Suggest rephrase as "that there is risk of injury or of the tail being broken."	Disagree, though wording changed
	RBP (j)	7	Suggest rephrase as "...wool, horns <i>or legs</i> ."	Disagree
	RBP (j)	19	Agree with sheep not being dragged or lifted by their horns, however given horns on animals are typically used in an aggressive manner which included high impact contact during mating season, what evidence is there that catching an animal by the horns causes any pain, or injury. Suggest remove the word "caught " from this recommended practise "	Agree, change made
	RBP (j)	24	What evidence is there that catching sheep by horns causes pain?	Disagree
	RBP (l)	13	This should be a Min Standard.	Disagree
	RBP (l)	23	Add "or drag"	Disagree
	RBP (m)	13	Suggest reword: "Dogs should only be used as necessary and should be under full..."	Disagree, though wording changed
	RBP (m)	15	Under what circumstances? – should this be included as a MS?	Disagree
	RBP (m)	19	By the use of <i>If it is necessary to use dogs</i> , it strongly infers that dogs would be preferred not to be used and their use is the exception rather than the norm. In reality dogs are an integral part of efficient stock movement practises in NZ. Suggest replacing " <i>If it is necessary to use dogs</i> " with " <i>When dogs are used</i> ".	Agree, changed
	2.2. Gl. Para 1	15	Suggest this para is rewritten to read: " <i>Animal handling is best when: handling procedures and handling facilities are ideal; animals have been selected genetically for improved temperament and have been adapted to human contact; and handlers are well trained and skilled.</i> "	Disagree
	2.2. Gl. Para 2	11	Suggest delete and refer to AGITO animal handling resource instead.	Disagree
	2.2. Gl. Para 2	15	Needs explaining in everyday language and expanding. Also this applies mainly to cattle. Needs additional information for handling sheep.	Disagree
	2.2. Gl. Para 2	23	The explanation of "point of balance" is not clear.	Disagree
	2.2. Gl. Para 2	24	Inclusion of the diagram that is used in the OIE code would be beneficial.	Disagree

	2.2. GI. Para 3.	15	Suggest reword to: " Sheep and <i>cattle have excellent</i> hearing..." The handling procedures statement applies to all animals, not just nervous ones.	Agree, changed
	MS 3	17	It should be possible to specify a maximum pace (speed), which may be too high in some circumstances but which at least provides a measurable maximum not to be exceeded.	Disagree
	MS 3	22	The key term "likely" is undefined and therefore problematic. We therefore believe the wording should be changed to provide an unequivocal outcome and instead read: " Sheep and beef cattle being moved on foot must not be forced to proceed at a pace that <i>will</i> cause exhaustion, heat stress or injury."	Agree, changed
	MS 3	23	This should not only concern speed of movement, but also other factors likely to cause exhaustion, stress or injury.	Disagree
	RBP (b), (c) and (d)	15	Suggest these should be made into MS's.	Disagree but included as example indicators
	2.3 GI	13	Suggest reference to website?	Agree, though section now deleted
	2.3 GI	23	"High visibility clothing" may alarm animals. If it has to be used, animals should be familiarized with it appropriately.	Disagree, though section now deleted
	MS4	14	This section implies that machinery used on animals should be carefully designed, used according to directions, with training and maintenance so as not to cause injury. However we think the issue of conveyers, crushes, yards, implements should be specifically addressed. In the Meat Works environment we have had to deal with issues caused by sheep washes eg the Klenzion / Windsor wash where sheep are moved in conveyors. Poor design or maintenance caused deaths by pile ups, injuries due to limbs caught in gaps. Dipping washes, etc, irrigators, hiplifters, calving aids and all sorts of tools eg see a Shoof catalogue if poorly designed or used carelessly could cause Animal welfare issues. So some sort of outcome based reference should be in there for those who design, import or use such things. The use of Technology on animals is likely to increase and there are no legal or approval devices we know of to control this area so some guidance in this code would be good, perhaps in 2.4 this could be addressed.	Disagree, not this code
	MS 4	24	Suggest restraining devices vs facilities are defined.	Disagree
	MS4 (a)	15	"...minimises..." not measurable	Noted

	MS4 (a)	16	Facilities that may be considered inadequate for nervous or excitable animals may be perfectly adequate for quiet, well handled livestock.	Agree, but wording not changed
	MS4 (a)	17	Needs to be more specific	Disagree
	MS4 (a)	22	This statement is overly restrictive and the word “likelihood” is undefined and should be removed.  The wording should be changed to read:” All facilities...must be operated in a manner that minimises the likelihood of distress or injury to animals <i>to the extent that it is reasonably practicable to do so.</i> ”	Disagree
	MS4 (b) (ii)	13	Suggest replacing ‘operators’ with ‘handlers’.	Disagree
	MS4 (b) (ii)	17	How will we know when operators are fully conversant?	Noted
	MS4 (b) (v)	24	Clarification that (v) applies to races	Noted
	MS4 (c)	17	Define supervision more clearly.	Disagree
	MS4 (c)	22	The key terms “physically restrained” (situational ie. confined by facilities/physically held by person?) and “supervision (constant/ intermittent/daily?) require clarification.	Disagree
	MS4 (c)	24	Define physically restrained i.e. cattle crusher vs yards are both forms of physical restraint. <i>Amend to read must be kept under reasonable (or appropriate) supervision.</i> Note: there is no definition of <i>restrained</i> or <i>tethered</i> . The dictionary definition of <i>restrained</i> is controlled. These minimum standards could be interpreted with unreasonable harshness. This section on restraint focuses entirely on the animals. It is equally (if not more) important to ensure a safe working place for people. The requirement on construction of facilities needs review. It is the use of facilities rather than their construction which affects the animals. The <u>manner of construction</u> will not affect the animals. The <u>type</u> of structure might.	Noted
	MS4 (d)	3	I strongly oppose the sale and/or use of electroimmobilisation devices to or by any individual other than qualified and experienced veterinarians. I strongly oppose the sale and/or use of electroimmobilisation devices to or by any farmer, no matter how experienced they are in farming stock. It is far too easy for electroimmobilisation devices to be improperly used, resulting in pain and suffering being inflicted upon stock. Electroimmobilisation devices would enable a farmer to singlehandedly carry out any procedure on stock that they chose to do. This could include dehorning, castration, docking, nose ringing	Noted

			etc. Using an electroimmobilisation device it would be easy for a farmer to do these and other things without needing any extra help. The farmer would not have to arrange for extra help or pay those helping. It would save the farmer time and require a lot less restraint. Many farmers would be tempted to use such devices inappropriately which would result in ongoing animal cruelty and abuse through unacceptable suffering and pain.	
	MS4 (d)	11	Suggest reword as "... be used <i>in accordance with manufacturers</i> instructions. Animals <i>must be able</i> to demonstrate...pain. <i>Electoimmobilisation devices</i> must not..."	Disagree
	MS4 (d)	13	NZVA policy opposes the use of electroimmobilisation equipment because controlled scientific studies have shown it may cause aversive behaviour and unnecessary pain and distress and because no significant analgesic effect has been demonstrated. We are disappointed that the proposed prohibition of the use of electroimmobilisation devices on which we made a submission in 2002 appears to have gone nowhere. We are aware of a recently introduced device, the Pacifier, which cannot truly be called an electroimmobilisation device because animals do retain some voluntary muscle control, and a study has shown that its use at recommended levels of stimulation does not cause significant stress as measured by blood cortisol levels in dairy cows. There may be a place for such devices for restraint in cases where operator or animal safety are at risk, but only at the lower settings and only with concomitant use of analgesia as appropriate. Perhaps some explanation on what 'restricted devices' means	Noted
	MS4 (d)	18	Replace with "Electroimmobilisation shall not be used." (to bring code in line with European standards).	Disagree, though a RBP added
	MS4 (d)	22	Has any consideration been given to whether this standard, might, under some circumstances, conflict with (occupational) health and safety requirements?	Noted
	MS4 (d)	23	The requirement that "Electroimmobilisation devices must only be used in a manner which allows animals to demonstrate normal responses to pain" is impossible by definition, as immobilisation prevents such responses. We do not believe electroimmobilisation should be used, and urge inclusion of a statement that it should not be used, preferably as a Minimum Standard but otherwise as a Best Practice.	Disagree, though a RBP added
	MS4 (d)	24	Plain English required as it is not clear what this sentence is saying? A definition or example of electroimmobilisation would be helpful.	Disagree
	MS4 (d)	25	We are opposed to the use of electroimmobilisation devices of any type. While some devices may be able to be operated to meet this standard, others clearly	Noted

			will not. Our concern is that electroimmobilisation devices may be used which to the untrained eye appear to meet the standard, but which under careful analysis do not meet the standard. Additionally, some devices may meet the standard when used at the lower end of their capabilities, but at some point when the charge is turned up would transgress the standard. How can the operator accurately determine the cut-off point?	
	MS4 (e)	11	Suggest rephrase as "...been <i>previously</i> habituated..."	Disagree
	MS4 (e)	13	Suggest reword " <i>If</i> sheep or beef cattle <i>are</i> to be restrained by tether (e.g. pets or show animals) <i>they</i> must have been..."	Disagree
	MS4 (e)	17	Define habituated.	Disagree
	MS4 (f)	18	We ask that an additional MS clause be added: "(f) Animals must not be restrained permanently." (to bring code in line with European standards).	Disagree
	MS4 (f)	24	"restrained by tether" needs to be defined.	Disagree
	MS Note	13, 24	Recommend a definition for "restricted devices" so that the impact of this recommendation can be understood.	Disagree
	RBP (c)	7	Suggest rephrase as "...when <i>it could predispose</i> livestock to stress..."	Disagree
	RBP (c)	13	Suggest insert " <i>Where possible,...</i> " at start of RBPo	Disagree
	RBP (d)	11	Why is second clause needed? Fences should not cause pain and distress.	Agree, wording change not required
	RBP	15	Suggest all RBP's (a-d) should be changed to MS's?	Disagree
	RBP	22	RBP are not written with cost considerations in mind ( e.g. c), but are acceptable, as aspirational "best practice" guidelines that farmers can choose to comply with.	Noted
	2.4 Gl.	17	'Adversive' should read 'adverse'.	Disagree, though wording changed
	2.4 Gl.	23	"aversive" is a mistake for "averse." However, the sentence should be rephrased as "Electroimmobilisation devices do not block pain and there is evidence that they cause discomfort or pain themselves, that is aversive to the animals."	Agree, wording changed
3. Food and Water	3. Intro. Para 3	15	Wrong appendix stated here.	Agree, changed
	Intro	23	The advice given here on feeding is much too general to be useful: the list of factors that need to be taken into account will not help any farmers to improve their feeding practices. This advice should be replaced or supplemented with guidelines on how food allowances should actually be determined – either by	Noted

			<p>information within the Code (expanding the information in Appendix III (<i>sic</i>) and increasing the emphasis placed on such information) or by reference to other appropriate sources.</p> <p>The statement that “Requirements are best determined by monitoring body condition and liveweight” is incorrect. Such monitoring is important in checking whether the allowances being fed are meeting requirements, but it is obviously important to make the best estimate possible of requirements in advance, rather than relying on the slow-responding indicators of body condition and liveweight to detect, late in the day, that feed allowances were wrong.</p>	
	MS 5	24	BCS is a scale of live animals and is desirable level hovers around the mid point. To say that animals are a less than the average is detrimental to their health at certain times of the year is dubious. Some farmers would also argue that sheep below BCS 4 are not ready for adverse weather conditions that may prevail through lambing.	Disagree
	MS5 (a)	15	This information need to be more specific in relation to age, physiological state (pregnant, lactating), species (sheep, cattle) and stage of life (calf, growing, adult). Not measurable	Disagree
	MS5 (a)	18	We ask that (a) be changed to “All animals must receive sufficient quantities of food and nutrients every day to enable them to (i) maintain good health; (ii) meet their physiological requirements; and (iii) minimise metabolic and nutritional disorders’. (to bring into line with European standards).	Disagree
	MS5 (a)	22	As meeting (i) with ensure that conditions (ii) and (iii) are met, - though the converse is not always true – it is recommended that (ii) and (iii) are removed.	Disagree
	MS5 (b)	7	Suggest rephrase as “ water <i>that is</i> sufficient for their needs <i>and not</i> harmful...”	Disagree, though wording changed
	MS5 (b)	15	Sheep can meet water needs solely through forage at times.	Agree, wording changed
	MS5 (b)	22	It is recommended that the phrase “... <i>and that is not harmful to their health</i> ” is removed as: It is unnecessary and it could be problematic to demonstrate compliance with should potential compliance issues arise.	Disagree
	MS5 (b)	23	Add “clean” before “drinking water”	Disagree
	MS5 (b)	24	The water requirement is access to water daily sufficient for their needs. In winter they don’t have a daily need for water. This rule will have ramifications for intensive beef systems when stock only have access to water every 3-4 days during winter.	Agree, wording changed

	MS 5 (c)	3	I oppose the clause “falls below 3” and propose that this be replaced with “falls below 4” A BCS of 3 is one of malnourishment. It describes the backbone as being “prominent” and the ribs as being “easily seen”. Any animal with a visible skeleton is emaciated and starving. This is not acceptable under any circumstances. This is not a condition of health. Minimum Standard No. 5 (c) allows an animal to be maintained in a BCS of 3 indefinitely. It says a beef animal with its ribs and backbone easily seen and prominent is an acceptable standard of welfare. I strongly oppose BCS 3 as being an acceptable condition to maintain any beef animal in.	Disagree, though scale now changed
	MS 5 (c)	7	Suggest deleting the first clause re: emaciation	Agree, changed to very thin
	MS 5 (c)	11	Suggest rephrase as: “...individual <i>beef</i> animal, except calves, <i>is</i> below...”	Agree, changed
	MS 5 (c)	15	What should calves be? BCS scale should be 1-9.	Agree, though scale now changed
	MS 5 (c)	24	Is there a valid reason for exempting calves? The scale in Appendix II is 1-9.	Agree, though scale now changed
	MS 5 (c) and (d)	14	This COW does not define the term “emaciation” Therefore this term is imprecise and of limited guidance value. The BCSs for sheep where some remedial response is required is inconsistent with the BCSs stated in both the Pig COW and Deer COW, and draft Dairy cattle COW where a response is required. It is inconsistent with the BCS for beef cattle stated in this COW. For BCS scales of 1 to 5, a BCS 2 should be the point where remedial action is required and, for consistency, must be advocated as the minimum standard at which a remedial response is required. This would be a comparable standard to other production animals. For BCS scales of 1 to 10, a BCS of 3 is consistently advocated where a remedial response is required. It is acknowledged that this may present a dilemma to the merino flock, but should the minimum standard be lowered to a point that might accommodate the merino breed, but be ridiculously low for all other breeds of sheep. A standard of “10% of a line of sheep at below BCS 1’ is considerably lower than the stated minimum standard BCSs in the other production animal Codes of Welfare and this creates a real differential in apparent welfare standards. While the intention may have been for this Minimum Standard to be interpreted within the context of a “whole flock feeding situation”, it could also be interpreted that BCS1 in an individual sheep is acceptable and not necessarily a welfare issue.	Agree, changed to very thin and scale now changed  Agree, wording changed

			This Code in its present form could minimise the legal responsibility to a point where animal welfare is likely to have already been severely compromised and the amount of suffering incurred considerable.	
	MS 5 (c) and (d)	17	Should refer to relevant appendices here.	Agree, changed
	MS 5 (c) and (d)	22	This is impractical as it stands as it gives no consideration to the economic aspects of the situation [In Appendix II states 'when body condition score drops below specified levels...remedial action may involve veterinary attention, improved nutrition and/or husbandry practice changes']. Slaughter is sometimes the only economic option and it is therefore recommended that parts c and d of this standard be altered to read: "...urgent remedial action must be taken to improve condition <i>or the affected animals) must be humanely put down.</i> "	Agree, changed
	MS 5 (d)	1	It is unreasonable to seek 'veterinary attention' at BCS of 3 as a) ewes will drop condition when lactating and gain condition when weaned and b) many farmers 'tighten up' the ewes after mating to build a feed wedge for winter. BCS of 3 is too high.	Disagree, does not require veterinary attention
	MS 5 (d)	3	I propose that the wording "If any sheep show signs of emaciation" be replaced with "If any individual sheep falls below BCS 2" I propose that the clause "or if the body condition score of 10 % of a mob of sheep falls below 1 (on a scale of 1-5)" be deleted. A BCS of 1 in a sheep is a condition of malnourishment. The BCS description includes the statement "spine prominent and sharp". An animal with a visible skeleton is emaciated and starving. This is not acceptable under any circumstances and is not a condition of health. Minimum Standard No. 5 (d) allows a sheep to be maintained with a BCS of 1 indefinitely. It says an animal with its spine appearing prominent and sharp is an acceptable standard of welfare. I strongly oppose BCS 1 being an acceptable condition to maintain any sheep in. It should not be acceptable for any individual sheep, let alone 10% of a mob to be maintained in a BCS 1.	Disagree, though wording changed
	MS 5 (d)	7	Thinks this standard is too low. Suggests rephrasing to 'if the body condition of any sheep falls to 1 or if the body condition of 10% or more of a mob of sheep falls below 2 on a scale of 1 to 5 urgent remedial action must be taken to improve condition'. I believe action must be taken well before any animal becomes a walking skeleton (emaciated) or 10% of a mob approach this state.	Agree, wording changed



	MS 5 (d)	13	On a scale of 1 to 5, <1 doesn't exist. These animals would be dead. If 10% of a mob were score 1, this would be an untenable situation.	Agree, wording changed	
	MS5 (d)	23	Replace "falls below 1" with "falls to 1"	Agree, wording changed	
	MS 5 (d)	24	There is no definition for emaciation in Appendix 1 (sheep). For beef it is defined as BSC2 in Appendix II. Not possible to fall below 1. Should read "...if the BSC of 10% of a mob of sheep is 1..... Body Condition Score should apply to individual sheep not the mob. Mob averages may make allowances for poor management practices. Consistency between this minimum standard and best practice needs to be made.	Agree, wording changed	
	MS 5 (d)	15	This is too late. There is no scientific evidence to support such a low level of body condition as a minimum standard. Scores below 2 are unacceptable on health grounds for pregnant ewes. Research is in progress to identify minimum acceptable BCS, and BCS 2 would be a good guess at this stage for lowland-type breeds. May be lower for Merino-type breeds.	Disagree, though wording changed	
	MS 5 & RBP (a)	18	We also ask that a MS clause be added: (e) Animals in ill health or poor condition, or in late pregnancy or early lactation, should not be deprived of food or water for longer than 3 hours. At present the draft code has no minimum standard for how long animals in these conditions can be deprived of food and water – it is only best practice under the draft code that the limit should be 12 hours. This limit is both too long, 3 hours is much more reasonable from an animal welfare point of view, and should be a minimum standard rather than best practice.	Disagree, though wording changed	
	RBP (a)	11	Suggest add "unless veterinary advice to the contrary is given." to the end of this statement.	Disagree, though wording changed	1
	RBP (a)	19	There is no mention at any stage within this section as to any recommended maximum timeframe animals should be without food other than that outlined in best practise (a). If there is any reasonable science available to support a recommended maximum timeframe for animals to be without food, then that should be included within this section.	Disagree, though wording changed and the science is discussed in the code report	
	RBP (a)	20	I would submit that an animal in ill health or poor condition, or in late pregnancy or early lactation, should have food and/or water available at all times.	Agree, wording changed	

	RBP (b)	7	What does “more palatable but toxic plants” mean?	Noted, phrase deleted
	RBP (b)	15	This should be a min standard, as severe health problems can arise if not followed.	Disagree
	RBP (b)	23	The first line may be misinterpreted. Rephrase as “If animals are to be given feeds to which they are not accustomed, they should be gradually introduced to those feeds ...”	Agree, wording changed
	RBP (c)	15	Suggest that this should be a Min Standard for pregnant stock.	Disagree
	RBP (d)	24	States that a full rumen can contribute to bearings. My understanding is that the issue of bearings is still being researched and that there have as yet been no valid conclusions. This statement should be removed. Overfeeding fat animals (not pregnant animals) is the concern with bearings.	Disagree
	RBP (e)	1, 2, 4, 11,13,14	Typing error - pg 14 (e) - BCS falls below 3. This is incorrect. As it stands it is saying that 2 is acceptable.	Agree, changed
	RBP (e)	1	I do believe that it is unreasonable to seek “veterinary attention” when BCS drops to below 3 ( but over 2). Ewes will drop condition when lactating and gain condition when weaned. Many farmers “tighten up” the ewes after mating to build a feed wedge for winter.	Disagree, does not require veterinary attention
	RBP (e)	15	There is no definitive published scientific evidence to help with establishing BCS thresholds for welfare. Good practice and experience would suggest a BCS of 3-4 is ideal, and BCS <2.5 is not the best for production with pregnant sheep. Suggest replace text with: “When the Body Condition Score (BCS) of any individual sheep falls below 2.5, (on a scale of 1-5), immediate remedial action, through veterinary attention, improved nutrition or husbandry practice should be taken to return the BCS to 3...” [And include a reference for the scoring method].	Disagree, though wording changed
	RBP (e)	21	This RBP shows inconsistencies ( i.e. falls below 3.....return to BCS 2)	Agree, wording changed
	RBP (e)	22	Are these numbers (3 and 2), the wrong way round?	Agree, wording changed
	RBP (e)	23	We believe that “below 2” is intended.	Agree, wording changed
	RBP (e)	24	This needs reviewing. It states that when BCS falls below 3, action be taken to restore to 2 – a poorer condition.	Agree, wording changed

	RBP (e) and (f)	15	There is no definitive published scientific evidence to help with establishing BCS thresholds for welfare. Good practice and experience would suggest a BCS of 3-4 is ideal, and BCS <2.5 is not the best for pregnant sheep.	Disagree, though wording and scale changed
	RBP (f)	13	The point of having BCS scale 1-10 rather than 0-5 is to allow more graduations and clarify each level. Using 4.5 and 7.5 when the table attached does not have half measures is probably unnecessary and may be confusing.	Disagree, though wording and scale changed
	RBP (f)	19	The BSC condition scoring of beef cattle in the code is very complex and would be interpreted on a subjective rather than objective basis. Is it feasible therefore to revert to half scores when an application is likely to be so subjective? The use of scores to 0.5 needs to be reviewed as to their true relevance.	Disagree, though wording and scale changed
	RBP (f)	15	Stores? Fatteners? Steers? Cows (pregnant, non-pregnant, lactating?). I doubt that the dairy system is applicable to beef cattle, which carry proportionately more fat subcutaneously than dairy animals.	Disagree, though scale changed
	RBP (f)	15, 17	Should be appendix II. Also RBP e) should be appendix I?	Agree, changed
	RBP (f)	24	The scale in Appendix II is 1-9.	Agree, though scale changed
	RBP (g) and (h)	15	Suggest that these should be made MSs.	Disagree
	RBP (g)	23	If the word "reticulation" is needed here it should be explained as it will not be generally understood.	Disagree
	RBP (i)	15	Depends on the length of time exposed to the wet/muddy conditions. This should be couched in terms of outcomes i.e there should be sufficient feed supplies (pasture or supplements) to cope with unexpected periods of feed unavailability.	Disagree
	RBP (j)	11, 15	Inadequate for what growth, production or survival? This should be couched in terms of outcomes.....sufficient feed should be available to maintain BCS, health within acceptable range.	Agree, RBP deleted
	RBP (j)	15	Relevance is not clear.	Disagree, but RBP deleted
	RBP	14	Also perhaps some Recommended best practice for metabolic disease needs to be here, particularly with respect to transport. We occasionally see issues at works with lactating or pregnant sheep and beef cows getting sleepy sickness or grass staggers or milk fever. Certainly significantly more female cattle are dead or down on arrival at meat works. Anecdotally lush grass in autumn or changes of diet can cause several cows to go down with grass staggers at the works.	Disagree

	GI	9	Water contaminants..... production and fertility <i>or contributing to</i> death. The sentence currently reads 'reduced appetite, production and fertility or death' (sounds like death is reduced by water contaminants).	Agree, wording changed
	GI para 1	15	Relevance is not clear.	Disagree
	GI	23	In the last line add "causing" before "death"	Agree, wording changed
4. Shelter	Shelter	12	<p>Each winter many thousands of lambs perish in the cold and often snowy conditions in, particularly, the South Island. Each time the farmers say the conditions "are unusual" and therefore are not bound to provide barns or areas where the lambs and their mothers can be protected from the cold. I'm aware it is cheaper for the farmer to let his lambs die than provide shelter but this is a shocking state of affairs. No longer can we claim to have a temperate climate that does not necessitate barns, or some sort enclosed shelter for vulnerable lambs in our extreme winters. The fact that many farmers also shear their sheep just before these winter conditions is cruel and greedy of them.</p> <p>Over many years I have been astonished at the lack of shelter belts in paddocks where sheep and cattle graze. There may be a few trees on the farm but the animals are always in unprotected paddocks in the blazing sunshine. It should be mandatory to have shelter/shade belts on all farms.</p>	Noted
	Intro. para 1	22	The word "fundamental" is redundant – persons either have an obligation or they don't.	Disagree
	Intro. para 2	15	Absence of rain only has indirect effects on animals- suggest delete part in [ ] brackets and reword rest of paragraph: "However, <i>extremes such as very cold, wet and windy conditions or snow and very hot humid conditions</i> and more normal ..." Flood not really a climate effect.	Disagree, though wording changed
	Intro. para 3	15	Suggest reword: "... sheep, <i>animals</i> suffering..."	Agree, changed
	Intro. para 4	23	In the penultimate bullet point, delete "mitigating"	Agree, paragraph deleted
	Intro. para 5	15	Suggest that this paragraph is reworded: "...postural changes such as <i>increased standing</i> , increased water consumption and <i>other</i> behavioural changes... <i>At unacceptably high</i> heat loads,... Core body temperature rises as <i>heat load rises</i> (hyperthermia) and <i>eventually under prolonged heat load</i> they may die."	Disagree

	Intro. para 6	15	Reference to core body temperature: This is only under very severe and prolonged cold conditions, otherwise body temp is strongly defended.	Disagree
	Intro. 3 <sup>rd</sup> to last bullet	7	Is this true roughage better than dry feeds?	Agree
	Intro. Also 7.6	2, 4	Mention should be given to 'cover comb' shearing which leaves an amount of wool on the animal thereby enabling a lessoned period of increased maintenance requirements (submission 4 recommends from April to mid spring).	Agree, included in 7.6
	MS 6	11	This MS sets a different standard to that given in the draft dairy code of welfare which states that all sheep and beef animal have access to shelter, whereas for dairy cattle this is not the case. Dairy NZ is unclear whether these are being treated differently for genuine reasons, or reflecting differences in production systems, in which case the distinction being made is not justified.	Disagree, consistent with deer code
	MS 6	24	Adequate shelter has a wide range of definitions when answered by farmers. I think we need to be very careful here not to confuse the relativity of natural or topography versus vegetation versus man made structures. This section requires further discussion for feedlots.	Disagree
	MS 6 (a)	7	Good but is this possible?	Noted
	MS 6 (a)	11	This sets a different standard to that for dairy cattle. Are we treating these animals differently for a genuine reason, or just reflecting existing difference in production systems?	Disagree, consistent with deer code
	MS 6 (a)	15	How much risk is acceptable? Suggest reword to: "shelter <i>or other means e.g. appropriate feed</i> to reduce the risk..."	Disagree
	MS 6 (a)	24	(a) and (d) could be combined to read Sheep and beef cattle must be provided with means to minimise the effects of cold and/or heat stress.	Disagree
	MS 6 (b)	13	Suggest adding "and hyperthermia"	Agree, though MS deleted
	MS 6 (b)	23	Replace "remedial" with "preventive".	Disagree, though MS deleted
	MS 6 (c)	7	Suggest rephrase as "...from <i>any</i> reasonably expected..."	Agree, changed
	MS 6 (c)	13	It is suggested that to adequately fulfill this MS, animals would need to give birth indoors.	Disagree
	MS 6 (d)	15	How is heat stress to be defined? This is not measurable.	Disagree
	MS 6 (d)	17	What does this mean? Do such means not necessarily include shade?	Disagree
	MS 6 (d)	18	We ask that clause (d) be changed to 'Sheep and beef cattle must be provided with means, including shade, to avoid the effects of heat stress.'	Disagree

			Without the addition of the subclause 'including shade' it might not be clear to animal managers that shade is an essential part of ensuring that animals are not subject to heat stress.	
	MS 6 (d)	25	We are very pleased to see this standard included and would hope it remains in the code as is.	Noted
	MS 6 (e)	7	What sort of 'health problems'?	Noted
	MS 6 (e)	15	What does this really mean in practice?	Noted
	MS	20	Sheep and Beef Cattle should have access to Shelter and/or Shade at all times.	Disagree
	General RBP (a)	15	Min standard-depends on level of heat stress that is acceptable. See MLA recommendations for feedlot cattle in Australia.	Noted
	General RBP (b)	15	Suggest that paragraph reworded to read: "...where conditions <i>can</i> become very muddy <i>such as</i> on crops <i>or small</i> areas of pasture during wet weather."	Agree, changed
	Storms, floods and droughts	15	Suggest RBP's (a) and (b i-iii).under section 'storms, floods and droughts' are made into MS's.	Disagree
	RBP (a) vii) and (b) ix)	13	Suggest adding veterinarians to these lists of authorities	Agree, changed
	RBP (a) vii) and (b) ix)	17	Give contact details for NAWEM and other authorities.	Agree, though paragraph deleted
	RBP (a) viii) and b) (ix)	22	The word 'local' does not require being in the sentence twice.	Agree, changed
	RBP (b) i) and ii)	11	Suggest these are covered by (a) (i)	Agree, wording changed
	RBP (b) i)	11	Suggest reword as "...plan <i>in place and make and implement</i> decisions..."	Agree, changed
	RBP (b) ii)	21	Suggest reword "...to be able to <i>be</i> provided..."	Agree, wording changed
	RBP (b) iv)	7	No. Suggest reword as "...reducing the <i>risk of heat stress</i> ."	Agree, though paragraph deleted
	RBP (b) v)	11	Suggest reword as "...during periods of <i>drought</i> ."	Disagree
	Gl. Para 1	24	Reference to shade requirements where FE is prevalent ignores the fact that shaded and sheltered =areas produce far higher FE toxins than exposed areas.	Agree, wording changed
	Gl. Para 2	2, 4	Reference to newly shorn sheep in adverse weather condition Suggest include "use of cover comb is a good practice say from April through to mid-spring"	Agree, though paragraph deleted

			because 'cover comb shearing leaves and amount of wool on the animal thereby enabling a lessened period of increased maintenance requirements.	
	Gl. Para 2	21	Suggest including "The use of cover combs at shearing may reduce the requirement for shelter and feed once past the 48 hour period. Cover combs are often used when shearing from late autumn until early spring or at other times when weather outlook is poor."	Agree, though paragraph deleted
	Gl. Para 3.	15	Change word 'worsened' to 'exacerbated'.	Agree, changed
	Gl. Para 5.	7, 13	Do we want to say 'that some animals may die' in a welfare code?	Agree, deleted
	Gl. Para 5.	23	Delete "optimal"	Disagree, though sentence deleted
	Gl	18	The primary concern of the Green Party of Aotearoa/NZ with regard to the animal welfare of sheep and cattle is to ensure that all agricultural animals are provided with shade, shelter and comfortable resting areas. However, there are aspects of shade and shelter which are not adequately covered, and many more points which together mean that the code does not adequately protect animal welfare. Animals should have access to shade at all times.	Noted
5. Behaviour	Intro. Para 1.	15	Implies that animals do not need to adapt to other challenges, which is clearly not correct. Adaption is a normal part of everyday life, and livestock have a vast array of effective adaptive mechanisms available. It is only when those mechanisms are stretched too far that welfare issues arise. Under most circumstances this does not occur.	Disagree
	Intro. Para 1.	24	More discussion around feedlots required. See introductory comments.	Noted
	Intro. Para 2.	15	This is vague. Good indicators of welfare include postural changes, ear/head position etc.	Disagree
	Intro. Para 3.	9	3 <sup>rd</sup> paragraph change 'those prevented from attaining a sense of isolation during birth' to '... isolation when <i>giving</i> birth' (it sounds like for the animal as it is born, as opposed to giving birth).	Agree, changed
	Intro. Para 4 BP 1	15	Yes, but confusing as not really relevant to livestock extensive environments.	Agree, but wording not changed
	Intro. Para 4.	23	These are not signs of abnormal behaviour but examples Bullet point 3: add "self-" before "isolation"	Disagree, but isolation deleted
	Intro. Para 5.	13	Do ruminants in poor welfare situations not ruminate or ruminate for shorter periods?	Agree, deleted

	Intro. Para 5.	15	Comment that this is far to general to be useful. If livestock are eating anything then they will ruminate. The pattern and duration of rumination may be altered in poor welfare, this is unlikely to be detected by casual observation.	Agree, sentence deleted
	Section 5	17	Minimum standards relating to this section should be included.	Disagree
	Section 5	18	MS suggested for this section. We ask that an MS be added to the code, with the following clauses: (a) Sheep and beef cattle must have sufficient space to enable them to behave and interact normally without excessive aggression. (b) Sheep and beef cattle must be given the opportunity to graze. These minimum standards (which are expressed in the draft code as Best Practice at 5(a) and 5(d)) are clearly required for the draft code to comply with the Act. In particular, the code is required to ensure that the behavioural needs of the animals is met. Without these minimum standards the behavioural needs are clearly not met.	Disagree
	Section 5	23	This is too general to be very useful. There should be a MS requiring stockmen to be familiar with normal behaviour and react appropriately to abnormal behaviour, achieved by appropriate training.	Disagree, see Stockmanship section
	RBP (a)	15	Delete words 'without excessive aggression'.	Disagree
	RBP (b)	15	This is essential for sheep unless well bonded to other animals (including humans).	Noted
	RBP (c)	7	Suggest add "...plenty of space <i>and careful observation</i> ."	Agree, changed
	RBP (c)	13	Add " <i>Bulls, especially, may incur serious injury if unfamiliar animals are put together.</i> " to end of statement.	Disagree
	RBP (c)	15	Add the word 'available' to end of this paragraph.	Disagree
	RBP (d)	13	What does this mean? Isn't it obvious?	Noted
	RBP (d)	15	Replace word 'graze' with 'obtain nutrients by foraging'.	Disagree
	RBP (d)	21	This statement effectively rules out feedlotting. Refer to 1.4. A prosecution brought against an operator of a feedlot may be very difficult to defend if this statement is brought into evidence.	Disagree, this is an RBP
	RBP (d)	24	More discussion required around feedlots.	Agree, see Feedlots section
	GI	23	Replace "hierarchies" with "relationships." After the first sentence, add "One outcome detectable by human observers is dominance hierarchies."	Disagree
6. Health, Injury and Disease	Intro.	9	I think it warrants a mention that the state and design of fences, yards and management of dangers such as tomos and cliffs impact on injury-prevention.	Disagree



	MS 7	9	Where does Organic Farming fit into the Minimum Standard? (Appropriate remedial action means that the animal's interests and the organic farmer's interests are not necessarily both catered for in some circumstances – e.g. I know of a vet trying to educate lifestyle farmers – every year they lose stock due to barber's poll worm, but only drench with cider vinegar).	Noted, Organic farming included within MS
	MS 7	14	There is a lack of clear direction in this set of minimum standards that animals that are likely to be suffering (from significant disease, injury, or in pain etc) must receive adequate attention to eliminate or alleviate this suffering. This must be clearly stated as a minimum standard – it is a core requirement of the Animal Welfare Act and a glaring omission from this COW.	Disagree, already requirement in Act
	MS7 (a)	13	Suggest add “recognising <i>signs of ill-health...</i> ”	Agree, wording changed
	MS7 (a)	17	How will such competence be assessed?	Noted, wording changed
	MS7 (a)	18	We ask that (a) be replaced with If animals are not apparently in good health, or are showing adverse behavioural changes the stockman shall take steps without delay to establish the cause and take appropriate action. If this immediate action taken by the stockman is not effective, a veterinarian must be consulted and, if necessary, expert advice should be sought on other technical factors involved. (to bring Code up to European standards).	Disagree, though wording changed
	MS 7 (a)	22	On the basis that farmers are not veterinarians, this standard would be improved by the addition of the wording ‘significant or serious’: “Those responsible for the welfare of sheep or beef cattle must be competent at recognising <i>significant or serious</i> ill health or injury and must take remedial action as appropriate.”	Disagree
	MS7 (a)	23	Add “preventive or” before “remedial”	Agree, changed
	MS7 (b)	13	Suggest adding “... <i>veterinary or other</i> professional advice.”	Disagree
	RBP (a)	21	The following paragraph infers too high an expectation of commercial farmers. Suggested reword: “ <i>Any document animal health plan that is put in place should identify the likely animal health challenges...</i> ”	Disagree
	RBP (c) and (d)	15	Should be MS's.	Disagree
	RBP (c)	13	Suggest reword: “... rumen capsules ( <i>especially when using a conveyor</i> ) to avoid damage to the mouth and throat by rough or excessive handling or by a nozzle with sharp or rough edges <i>and also to prevent misadministration of the product.</i> ”	Disagree

	RBP (c)	23	This should be in the MS	Disagree
	RBP (d)	24	Suggest and additional category “to establish an appropriate health plan”.	Agree, wording changed
	RBP (e)	24	States that <i>supplements should be provided</i> . This is overstating the case because most trace elements are provided adequately as long as adequate feed is supplied. This should be reworded to read <i>supplements provided if necessary though.....feed</i> . Suggested alternative wording “as needed” otherwise potential issues around drench/drug companies recommending or delete as this is not an animal welfare concern but rather a nutrition concern. However if feed is adequate then this is not an animal welfare concern.	Agree, wording changed
	RBP	9	Suggest additional paragraph that drench-guns are regularly checked for accuracy, that mechanisms are checked regularly throughout treatment to ensure accurate doses are administered. Medications should also be administered according to appropriate body-weight, as per manufacturers’ instructions.	Disagree
	RBP	14	Some specific Best practice we would like to see (from animal welfare cases database at meatworks) Facial excema – do not send acutely affected animals to the works. Allow them months to recover. Injection site lesions. Use best practice so not to cause abscesses. Animals with ingrown horns (ie growing into head) (sheep and beef) must be treated on farm and not sent to the works Animals with Amputated legs, fractured legs – sometimes even if healed, shearing cuts and achilles tendon wounds must be treated and not sent to the works unless completely healed. Animals with wire around legs or tape/ stitches must be treated and heal and not be sent to the works. Recently de horned/ tipped animals must not be sent to the works. Dogs must not bite sheep. Animals should not be handled so to cause bruising. Bearing ewes, prolapsed cows, animals recently given birth (2 weeks) and with retained membranes/ cleanings must not go to the works. Severe cancer eyes must not go to the works. Animals dying of cancer should not be sent as culls.Note: Get vet cert if unsure or petfood on farm Chronic, purulent, gangrenous, smelly or maggot infested injuries should be treated and not sent to the works.	Disagree

	GI para 2	23	Delete "Most"	Agree, changed
	GI para 4	13	Suggest moving Veterinarians to beginning of sentence.	Agree, changed
7 Husbandry Practices	7 and 7.1 Intro.	14	What is meant by "desirable"? This term "desirable" will mean different things for different people. It clearly could present a conflict between "desirable" welfare goals and "desirable" production goals.	Noted, wording changed
	RBP	14	Many of the points listed in this section should be regarded as "minimal standards" rather than "best practice"	Disagree
	RBP (a)	7, 23	Delete "optimised," as the implications are not clear, and rephrase as "health and welfare objectives should be prioritised in animal selection practices."	Agree, wording changed
	RBP (b)	11	Suggest reword as "...should be <i>avoided</i> ."	Agree, changed
	RBP (b)	13	This RBP is unclear.	Disagree
	RBP (f)	7	Suggest include "... animals' <i>supervision, feeding...</i> "	Agree, though RBP deleted
	RBP (f)	13	This should be deleted as it is covered more appropriately in the GI section under 7.1.2 Suggested reword: "... expected, <i>priority feeding and management should be given to those ewes identified, preferably by scanning, as carrying more than one lamb.</i> "	Agree, RBP deleted
	RBP (f)	23	After "ewes" add "with more than one lamb"	Agree, though RBP deleted
	RBP (g)	2	The statement "well fed during early and mid pregnancy" is very contentious There is evidence to suggest early pregnancy feeding can lead to lambing difficulties and bearings. Experts suggest mid to late pregnancy feeding - depending on litter size - as contested to under General Info 7.1. Could be changed to "thought given to correct feeding levels at crucial times - with advice from vet or farm advisor".	Agree, wording changed
	RBP (h)	21	Suggested reword: "Animals, particularly males <i>that are</i> likely to lose condition..."	Agree, changed
	RBP (h)	23	Replace "particularly" with "including"	Disagree
	GI para 1	14	Do we have evidence that breeding schemes targeting disease will reduce the need to mustering and yarding? This introductory paragraph is very broad and not necessarily based on fact.	Disagree
	GI para 2	14	This should be outcomes based – ie these animals should be managed so that they will continue to grow and reproduce in adult life, and experience minimal	Agree, though wording not changed

			suffering or distress associated with birthing difficulties, and lamb and calf losses.	
	GI para 2	23	“implementing” is intended, not integrating	Agree, changed
	7.1.1 Introduction	13	Does this imply that all farmers should be exposing their animals to facial eczema and footrot? Surely this means the susceptible ones will be “stressed”.	Disagree, though wording changed
	7.1.1 Intro	23	The phrase “can be further enhanced” involves arguable assumptions. Replace with “has sometimes included”	Agree, changed
	MS8 (a)	7	Is this appropriate for general public?	Noted
	MS8 (a) and (b)	14	This minimum standard as stated creates an anomaly with other welfare legislation and practices. Animals in “research and testing” are subject to far greater ethical scrutiny including a ‘cost benefit’ analysis. Where is the ethical consideration in these statements, and any reference to the mechanisms that govern other “testing”. Is this COW suggesting that “tests” on sheep and beef cattle are outside of these considerations? I should sincerely hope not.	Noted, Part 6 of Act is separate. The accompanying code report covers this issue
	MS8 (a) iii)	15	This statement is too vague.	Agree, wording changed
	MS8 (a) iii)	23	Replace “minimised” with “reduced.” If reduction is only “as far as practically possible” that is not actually minimisation	Disagree, though wording changed
	MS8 (c)	13	We suggest that MS8(c) be altered to read “...must only be conducted in the presence of a veterinarian <i>and according to NZVA guidelines</i> ”. This would align it with the other issue within this section – that of testing for facial eczema resistance – in that no details are given for how the latter is performed by the veterinarian.	Disagree, though wording changed
	MS8 (c)	23	Clarify: isn’t this just mating?	Disagree
	MS8 (c)	24	Two tests involved in testing reproductive soundness ie the capability and libido tests that must both be carried out in the presence of a vet?	Disagree, though wording changed
	MS8 (c) & (d)	25	Is opposed to the use of the Blocky Test and similar tests to indicate the serving capacity of bulls. Such tests are unacceptable as they totally disregard the welfare of the cows or heifers used. We submit that the standard should not allow the use of such tests.	Disagree
	MS8 (d)	2	Number of services must not exceed 10 per cow contradicts RBP (iv) number of services must not exceed 5 per cow.	Disagree, though wording changed
	MS8 (d)	9	I feel the 10 services per cow is quite high – perhaps a note to refer to ‘best practise’ guidelines of no more than 5. I am not familiar with procedures for	Disagree, though wording changed

			reproductive soundness testing of bulls, so it depends on how servicing is undertaken. Think a female should not be heavily restrained and have an element of choice to be appropriate to both sexes' behaviour.	
	MS8 (d)	13	In relation to the testing of bulls for reproductive soundness, we have some concerns about variation from the NZVA standard as specified in Parkinson and Bruere 2007 <i>Evaluation of bulls for breeding soundness</i> . Although this reference is quoted in the text of the draft code as containing the best practice standards for the reasons for and conduct of mating ability tests, MS 8(d) does not align with the Parkinson and Bruere.	Agree, wording changed. The accompanying code report covers this issue
	MS8 (d)	15	Suggest reword this MS to: "When <i>several bulls are tested at the same time</i> for reproductive soundness the number cows <i>available must be at least equal to the number of bulls</i> and the number of services must not exceed 10 per cow."	Disagree, though wording changed
	MS8 (d)	23	Not clear: does this mean "1:1 at any one time"?	Noted, wording changed
	MS8 (d)	24	No more than 15 is the standard. Over what time is 10 services acceptable? E.g. daily	Noted, wording changed
	RBP	23	Again, quite a lot of this should be in MS	Disagree
	RBP (a)	7	Does this not require vet supervision?	Disagree, covered by MS
	RBP (a)	13	How practical is this with sheep?	Noted
	RBP (a)	21	Suggested reword: "...Dose rates should be chosen to allowing assessment of GGT from blood samples but not to induce clinical disease."	Disagree
	RBP (b)	11	Suggest rephrase as "...meet <i>current</i> best practice standards..."	Disagree, but wording changed
	RBP (b)	23	This is oddly phrased, as this is itself a list of best practice standards.	Agree, wording changed
	RBP (c) and (d)	7	Don't these require supervision by experienced person?	Agree, covered by MS
	RBP (c)	13	Is this what happens in reality though? Is this not a normal procedure to test whether bulls have good libido, rather than when inferior bulls are suspected?	Disagree
	RBP (c)	24	Include "In the presence of a veterinarian".	Disagree, covered by MS
	RBP (d) (ii) & (iv)		We have some concerns about variation from the NZVA standard as specified in Parkinson and Bruere 2007 <i>Evaluation of bulls for breeding soundness</i> . Although this reference is quoted in the text of the draft code as containing the	Agree, wording changed.

			best practice standards for the reasons for and conduct of mating ability tests RBP(d)(ii) & (iv) do not align with the Parkinson and Bruere.	
	RBP (d)	23	Rephrase as "For tests for libido and serving ability it should be ensured that:" (ii) Replace "oestrous" with "oestrus"	Disagree
	RBP (d) (iv)	24	In contradiction with the minimum standard of 10 services per cow.	Disagree, though wording changed
	Gl. Para 1	14	Again this is a very sweeping statement that does not indicate any form of "control" There needs to be a clear statement about "controlling parameters" and "controlling situations ".	Disagree
	Gl. Para 2	23	Libido does not indicate fertility	Agree, wording changed
	Gl. Para 2	24	Relationship to fertility is not absolutely linked.	Agree, wording changed
	7.1.2. Intro.	14	Is this necessarily for "better management"? These techniques may provide increased rate of gain for specific traits but that does mean that this necessarily leads to "better management". If these traits are purely production focused, this could be at the expense of welfare.	Disagree
	MS 9 (a)	13	The NZVA regards laparoscopic AI as a significant surgical procedure which should therefore be only performed by a veterinarian or veterinary student under supervision. How are operators assessed as "trained and competent"?	Agree, though wording not changed
	MS 9 (a)	18	We ask that the following clause be added: (xx) Electro-ejaculation shall not be used other than for veterinary diagnosis when there is no other method available. In such exceptional circumstances, it shall be carried out under strict veterinary control. Accordingly, we ask that electro-ejaculation is removed from MS9 a). (to bring Code into line with European standards).	Disagree
	MS9 Note	3	I strongly support NAWAC recommendation "that surgical embryo transfer be listed as a significant surgical procedure".	Noted
	RBP (a)	13	How practical is electro-ejaculation with sheep?	Noted
	RBP (b)	14	This hints at being purely production orientated. The cost: benefit considerations need to be wider than this and better stated.	Agree, RBP deleted
	RBP (b)	23	Add "in relation to the severity of the welfare problems caused."	Disagree, though RBP deleted
	RBP (c)	13	Suggest replace "litter size" with fecundity and "able to be provided" with providable.	Agree, changed Disagree

	GI	13	We would wish to see more information included about ultrasonic scanning of cattle because of the risk of rectal perforation if not done correctly. We suggest the following information is added. Ultrasonic scanning needs to be carried by trained and competent operators to prevent the risk of rectal perforation which can lead to peritonitis and death. It is important that cows are adequately restrained to prevent excessive movement. . Lubricant should be used for every cow. The probe should be inserted smoothly and with no excessive force. If the cow attempts to defecate withdraw the probe and insert once defecation is finished.	Disagree
	7.2 p 28	17,18	Minimum standards relating to this section should be included.	Agree, MS added
	7.2 p 28	11	Recommends that NAWAC prohibit the use of moving vehicles for the purpose of providing traction by means of a MS, as was proposed in the draft of Dairy code of welfare. The fact that motorized traction may not be commonly applied to sheep is further reason why these species should be covered in separate codes.	Agree, MS added
	RBP (a)	23	Should be in MS	Disagree
	RBP (f)	13	Comment made that “having every ewe BCS 3 at lambing is a huge ask, impossible on most farms. There is plenty of evidence to show single ewes can be BCS 2”.	Disagree
	RBP (f)	23	Rephrase as “should be either 3 or 4”	Disagree
	RBP (g)	15	This is correct for dairy, is it correct for beef?	Disagree, though scale changed
	RBP (g)	23	Add “at least” after “should be”	Agree, changed
	RBP (g)	24	Suggest including “(on a scale of 1-10)”	Agree, changed
	RBP (h)	23	After “used” add “if necessary, and then.” And it should then be specified under what conditions this is necessary.	Agree, changed and now a MS
	RBP	14	Again these “best practice” statements resemble more what should be current practice, and basic “common sense” husbandry.	Disagree
	RBP	21	A new point should be added: “ where lambing percentages are expected to be in excess of 160% ewes should be scanned during mid-pregnancy to allow preferential treatment and supervision to be given to animals carrying triplet lambs prior to and immediately after parturition.”	Agree, changed from section 7.1
	RBP	24	Another recommended best practice needs to be selection of suitable paddocks without natural hazards e.g. steep gulleys, under runnings etc. See the following research for more information <a href="http://www.maf.govt.nz/sff/about-projects/search/05-104/triplets-for-profit.pdf">http://www.maf.govt.nz/sff/about-projects/search/05-104/triplets-for-profit.pdf</a>	Agree, wording changed in current RBP

			Another recommended best practice needs to be sheep and cattle should be disturbed as little as possible around pre and post parturition time.	Disagree, already covered in RBP(c)
	GI	2	Once again it touches on feeding well in early and mid pregnancy ensuring good placental development. Yes, placental development is important, but overfeeding at this stage can lead to an enlarged placenta causing bearings.	Disagree
	GI	23	Rephrase the last paragraph as "If a ewe or cow needs assistance, clean and hygienic conditions should be provided."	Agree, sentence deleted
	7.2 Lambing	24	Needs rewording "and should be if..." necessary	Agree, wording changed
	7.2 Lambing	2	Paddock slope cannot be mentioned in causes of bearings. This is unproven and in my opinion, quite wrong. Aside from this, mentioning slope in any clause in the Animal Welfare for Sheep and Beef Cattle will lead to disqualification from breeding for hill country farmers and would become a contentious issue.	Disagree, though wording changed
	7.2 Lambing	7	Farmers have cruel methods of retaining bearings (suturing with wire or string without anaesthetic). It is important to state that purpose-made bearing retainers are best. If suturing is to be carried out, expert advice preferably from a veterinarian should be obtained if necessary beforehand. All efforts must be made to minimize pain or discomfort and sutures and pins must be removed when lambing is imminent.	Disagree
	7.2 Calving	18	MS suggested for addition: We ask that this standard be added to the code, with the following clause: Mechanical devices used to assist in calving cows must be designed for that purpose and must only be used by a trained and experienced operator. This clause will ensure that inappropriate mechanical devices that are commonly used to assist in calving, such as four-wheeled motorbikes, are seen as unacceptable for this purpose, and that prosecutions for this practise can be pursued. It is also imperative that people using purpose designed devices are trained and experienced in their use. This is not just best practice – it must be a minimum standard.	Agree, MS added
	7.2 Calving	23	The second paragraph says "can be dealt with as for sheep," but this was not explained for sheep.	Agree, sentence deleted
	7.3 Intro	13	Use of the word 'larger' - does this mean "older"? Unclear.	Disagree, but phrase deleted
	7.3.1	9	Colostrum - perhaps recommended maximum time to first colostrum be stated?	Disagree



	MS 10	22	<p>This standard as written presents a number of difficulties:</p> <ul style="list-style-type: none"> <li>(i) it is open ended,</li> <li>(ii) It appears to be written assuming hand rearing, but this qualification is not included and does not give farmers any other option in terms of dealing with newborn animals</li> <li>(iii) In some circumstances it will not be possible to deliver this outcome</li> <li>(iv) It is hoped that poor quality commercial colostrum substitutes would not be allowed on the market.</li> </ul> <p>Needs to have "...where appropriate." Added at the end of the standard.</p>	Disagree
	MS 10	24	<p>There is no good reason for requiring <i>good quality colostrums</i> to be <b>commercial</b>. There is no definition of commercial given and the only requirement should be for it to be of <i>good quality</i>. The word <i>commercial</i> should be deleted.</p> <p>Do not believe there should be any use of colostrum substitute- there is little evidence that they are very effective. Remove last five words.</p>	Disagree
	MS 10	25	<p>The standard as written is vague as to what is meant by "sufficient colostrum" – what is the welfare measure? We submit that all lambs and calves, with the exception of those that are orphaned, should spend at least the first three days of their lives with their dams to ensure they gain the colostrum they need.</p>	Disagree
	RBP (b)	13	Rephrase as "Every lamb or calf should receive colostrum..."	Agree, changed
	RBP (b)	23	Rephrase as "Every lamb or calf should receive colostrum from its dam or another female as soon as possible after birth and within the first 6 hours."	Agree, changed
	RBP (c)	13	Rephrase as "animal's life, and ideally for a longer period, as..."	Agree, changed
	7.3.2 Intro	7	'linking' needs careful supervision to prevent injury to the calves and this should be added.	Disagree
	7.3.2 Intro	23	"linking" needs explaining	Disagree
	7.3.2 Intro	24	Suggest adding in 2 <sup>nd</sup> bullet point " <b>particularly</b> where the recipient...".	Agree, changed
	MS11 (a)	7	Suggest reword as "Where <i>restraint is used to help train a ewe or cow to adopt.....is sucking and the lamb or calf is not injured.</i> "	Agree, wording changed
	MS11 (a)	9	When ewe or cow is restrained for fostering purposes, what is maximum time an animal may not have access to water?	Disagree, covered by MS 5
	MS11 (a)	15	How frequently?	Disagree
	MS11 (b)	7	Suggest reword as "...calf must <i>promptly</i> be removed..."	Disagree

	MS11 (b)	13	Suggest a suggested time period should be given in the General Info on how long it is recommended to persist with fostering, otherwise this min std is not that meaningful, and in fact very obvious.	Disagree
	MS11 (b)	15	Delete 'foster animals' and replace with 'young'.	Agree, changed
	MS11 (b)	25	The standard as written is vague as to what is meant by "adequate nourishment" – what is the welfare measure?	Disagree
	MS11 (c)	7	Suggest reword as "...to utilise <i>pasture and other solids</i> ..."	Agree, changed
	RBP (d)	13	Compare this with RBP(d) under 7.3.1 (pp30)	Agree, RBP deleted
	RBP (e)	4	Reference to temperature of milk for calf rearing, suggest that Now a lot of calves are reared on cold milk once a day.	Noted
	RBP (f)	11	Suggest rephrase as: "...first feeding <i>after transport</i> should be considered."	Agree, changed
	RBP (g)	11	Suggest rephrase as: "...and undergo <i>regular and thorough</i> disinfection."	Agree, changed
	RBP (d) (g)	23	Again, several of these practices should be MS.	Disagree
	RBP (f)	23	Both of these sentences are weak. How long does evidence suggest is necessary for settling? And does evidence support feeding of electrolytes or not?	Disagree
	GI	23	Rephrase as "if fed frequently: three or four times daily for the first week of life"	Agree, changed
	7.4 Intro. Para 2	15	Suggest adding <i>early</i> to end of sentence.	Disagree, though wording changed
	7.4	17	Minimum standards relating to this section should be included.	Disagree
	RBP	7	Age at weaning. Like to see mention of usual age of weaning (8-10 wks) and a recommendation that as a general rule calves and lambs should not be weaned before 6 weeks of age. Suggest reword as "...pasture, <i>usually around 6-8 weeks of age</i> ." Also add 'The water supply of ewes whose lambs have been newly weaned should not be restricted' 'Ewes should not be put onto lush pasture after weaning as the incidence of mastitis may increase'.	Disagree  Agree, wording changed Disagree  Disagree
	RBP (a)	10	Replace current text with "...to obtain all of their required sustenance from pasture <i>or some other feed</i> ." In some cases feed will be something other than pasture (eg concentrates or a crop).	Agree, wording changed
	RBP (a)	13	The RBP states that most of the sustenance should be coming from pasture prior to weaning. Is this directed at animals going into an intensive system?	Disagree
	RBP (a)	24	Is this an animal welfare issue. Pet lambs and bobby calves are weaned early therefore consistency needs to be applied.	Disagree

			Suggest that some reference is made to calves cannot be transported under 4 days of age –as per the transport code. Consistency required.	
	GI	24	It is not correct to say that <i>progressive weaning</i> (with dam and offspring in adjacent paddocks) is less stressful. My experience over 40 years is the reverse, and quite strongly so. Is there science to support this?	Disagree
	7.5 Intro	24	Does ear tagging cause pain? Is it necessary to follow general principles for painful husbandry for ear tagging?	Disagree
	MS 12	17	Should be possible to define what pain relief and approximately how much.	Disagree
	RBP (a)	7	Suggest rephrase as: "... performed, <i>as little as possible and no more than...</i> "	Agree, changed
	7.6. Intro, para 2	7	The advantages of pre-lamb shearing should be balanced with mention of the disadvantages. Perhaps add to the second paragraph 'However, if pre-lamb shearing is carried out without providing the necessary extra food and effective shelter, ewes may suffer cold stress'.	Agree, changed
	7.6. Intro, para 2	13	One comment "Does shearing 4-6 weeks increase birthweights? The Massey work shows shearing at around day 70-80 can improve the birthweight of multiple lambs as long as they have the predisposition to do it. This timing is quite different from 4-6 weeks pre-lamb. Shorn ewes may seek shelter but the common observation is that they leave their lambs behind, or when they are all concentrated in the shelter there is increased chance of mis-mothering".	Disagree
	7.6. Intro, para 2	23	Replace "enhance" with "promote"	Agree, changed
	MS 13 (a)	11	Suggest deleting "extensive or severe"	Disagree, though wording changed
	MS 13	14	This minimum standard should include a statement that "shearing equipment and technique/staff must be such as to minimise cuts and injuries occurring'.	Disagree
	MS 13	18	We ask that the following clauses be added: (to bring into line with European Standards) (ww) Adult sheep of wool breeds must be shorn at least once per year. (xx) Shearing must be carried out by a competent operator in a way which causes the least possible harm or distress to the animal. (yy) Shearing instruments must be regularly cleaned and disinfected and be in a fully serviceable condition appropriate to the size and age of the animal. (zz) Prior to, and during, shearing sheep shall be handled carefully to avoid injury. Any shearing wounds must be treated immediately.	Disagree
	RBP (a)	23	Replace "mitigate" with "address"	Disagree

	RBP (a)	24	Suggest deleting "Usually this would be once a year."	Disagree, though wording changed
	RBP (b)	2	Cover comb shearing leaves and amount of wool on the animal thereby enabling a lessoned period of increased maintenance requirements.	Noted
	RBP (b)	7	Suggest should be a MS: "In winter and in districts prone to very cold weather and in areas where there is minimal natural shelter or where shearing is undertaken before lambing, sheep must be shorn using winter, snow or cover combs, lifters or blade shears to ensure they retain an insulating layer of wool."	Disagree
	RBP (b)	21	Cover combs are only mentioned once with no context in part 7.6. It maybe useful to include a statement in part 4. GI.	Disagree
	RBP (d)	7	Suggest rephrase as "...carefully to <i>prevent</i> shearing cuts, <i>especially to</i> the teats, vulva and <i>prepuce</i> ."	Agree, changed
	RBP (d)	14	This should be the minimum standard.	Disagree
	RBP (e)	7	Suggest rephrase as "...shearing cuts may <i>become infected</i> ."	Agree, changed
	RBP (f)	4	This is not that easy to achieve - to have enough feed for several weeks handy to covered yards or shelter.	Disagree
	RBP	7	Suggest GI becomes RBP (g) "As sheep with a full rumen may suffer distress while being shorn they should be fasted for up to 12 hours beforehand. The time off feed should be no more than a few hours for pregnant ewes.	Disagree
	GI Para 1.	15	Term 'best fasted'. For how long? See MWNZ Poster for guidelines.	Disagree, though wording changed
	GI Para 2.	13	This exactly repeats most of the 2 <sup>nd</sup> para under Gen Info in 4. Shelter.	Agree, deleted from section 4
	7.7 Intro.	13	The Green fly does not need the common attractants mentioned.	Disagree
	7.7 Intro.	18	Frequent inspection of sheep to identify early strike cases should be made best practice.	Disagree
	MS 14	23	Title should be "Preventing and treating flystrike"	Agree, changed to Managing Flystrike
	MS 14 (a)	23	This is a very weak requirement for such a serious problem. A stronger and more detailed standard is needed.	Disagree
	MS 14 (a)	25	We submit that this standard should read "All reasonable steps..." in that it is not a matter of taking "some" reasonable steps, but of taking "all" reasonable steps.	Agree, changed
	GI.	18	In this section 'Preventing flystrike' it appears that a new category suggested animal management practises has been introduced – 'General Information'. However it is clear that the points identified under this sub-title should be at the	Disagree, though section changed to Managing Flystrike

			very least 'best practise', as failing to adhere to these points puts sheep at substantial risk of harm which is at odds with the Act.	
	Gl. Bulletpoint 1 and 2.	15	Should be MS's.	Disagree
	Gl. Bullet point 3	13	The relationship between this [shortening the scrotum (cryptorchid) or castration] and flystrike was questioned – reference?	Agree, phrase deleted
	Gl. Bullet point 3	7	Lists tail docking in male lambs for preventing strike. Should say that 'when tails are docked to the correct length dags are less likely to form'. Dags form more readily on undocked tails but also on tails that are too short.	Disagree
	Gl. Bullet point 8	24	Need to delete "containing condensed tannins" and add in ryegrass with safe endophytes as an e.g. plant.	Agree, changed
	Gl	7	The bullets could be subdivided into those preventing dag formation (3,4,6,7,8) those aimed at detection (1,2) and those keeping flies off sheep (5,9,10)	Agree, order changed
	Gl	9	General information on preventing fly strike – it could be useful to include 'frequent inspection of sheep to identify early strike cases <i>which often present as head-down posture, 'tail'-wagging or stamping feet</i> '. This would give new/lifestyle farmers a steer as to whether unusual behaviour was present.	Disagree
	Gl	7	State NAWAC's position in the code e.g. fully supportive of the NZ Merino Industries initiatives.	Disagree
	7.8. Intensive Sytems.	17	The potential for intensive systems to impact negatively on animal welfare appears to be, on balance, greater than that of 'conventional' farming in open paddocks. Intensive farming of sheep and beef cattle is not established in this country to nearly the same extent as 'traditional' farming methods, and thus there is less vested interest in the costs of regulation. For these reasons it is considered that the Code should establish relatively onerous Minimum Standards (more than the draft Code currently proposes) for this category of the sheep and beef cattle industries.	Noted
	7.8 Para 1.	13	It is suggested that the preparation for international transport be included in here as a specialised form of intensification.	Disagree
	7.8 Para 3	23	"Inevitably one or more of the animal's needs are" with "Some of the animal's needs may be"	Agree, wording changed
	7.8.1.	11	There is some confusion over the use of feed/wintering pads. This may reflect the differences in their use within the dairy and beef industries. In the dairy industry, feed pads are constructed out of concrete and are used to hold animals for short periods only. Wintering pads are used to hold animals for extended periods are are not constructed from concrete. There are exceptions in some newer winter housing systems where alternative substrates are used	Agree, section changed to Feeding Pads

			for animals to lie on. Suggest that a distinction between the various uses of feed and wintering pads and recommends that a RBP is added stating that 'stock should not be wintered on bare concrete pads'.	
	MS 15 (a)	17	Their behavioural needs in relation to what? Rest? What about other behavioural needs which intensive farming may impact upon?	Disagree
	MS 15 (b)	22	While in general agreement with this standard, some members felt that it was not necessary for all animals to be able to feed at the same time.	Agree, wording changed
	RBP (a)	11	This contradicts the dairy code, where concrete is permitted. There is also confusion over the use of feed vs. wintering pads.	Agree, wording changed
	RBP (a)	24	More discussion required around feedlots.	Disagree
	RBP	11	Suggest including an RBP "Stock should not be wintered on bare concrete pads."	Disagree, though section now just feeding pads
	7.8.2 Intro	23	Replace "ensure" with "safeguard"	Agree, changed
	MS 16 (a)	17	Their behavioural needs in relation to what? Rest? What about other behavioural needs which intensive farming may impact upon?	Disagree
	MS 16 (c)	7	Suggest rephrase as "Animals <i>that are not eating</i> must be removed..."	Disagree
	MS 16 (c)	11	Agree with this MS but also believes that such animals should be permanently removed to other facilities or humanely destroyed in order to avoid any unnecessary suffering by returning them to the feedlot. Suggest rephrase as: "... fodder, <i>and facilities, or humanely destroyed.</i> "	Disagree
	MS 16 (c)	22	In general agreement with this, but some clarification around the term "failing to adapt" is required.	Disagree
	RBP (a)	23	Change "preferably of" to "preferably with." And add "Mounds may be necessary to maintain dry areas for lying."	Disagree, though wording changed
	RBP (d)	22	The suggestion that feeding troughs be covered is not needed.	Agree, wording changed
	RBP (d)	23	Delete preferably.	Disagree, though wording changed
	RBP (g)	22	The guidelines around cleaning are not workable.	Disagree
	RBP (g)	23	After "resting" add "(for example a mound)".	Disagree
	RBP (h)	7, 13	Suggest rephrase as "...posts, mounds <i>and "toys"</i> to encourage normal behaviour <i>and reduce (or help relieve) boredom.</i> "	Disagree
	RBP (h)	23	Mounds are not necessarily just enrichment: they may be essential.	Disagree

	RBP (j)	7	Suggest rephrase as "... feedlots should <i>keep</i> up-to-date <i>with relevant</i> information or <i>maintain regular</i> contact with professionals..."	Agree, changed
	RBP	13	Suggest adding RBP "Sheep should be provided with fibre in the diet to prevent wool chewing."	Agree, RBP added
	RBP	23	Add a requirement for shelter and shade	Disagree
	Gl. Bullet point 1	13	Shy-feeders – should this be hyphenated?	Disagree
	Gl. Bullet point 6	23	Riding or bulling needs fuller treatment, including statement that electric wires over pens should not be used to prevent this.	Disagree
	Gl. Para 2	17	Wrong appendix referred to here.	Agree, though sentence deleted
	Gl. Para 4	23	Replace "but should not be regarded as a replacement for" with "and should be practised in addition to"	Agree, wording changed
	Gl. Para 5	23	This should be a requirement.	Agree, included in RBP
	Gl. Para 6	23	These should also be requirements	Disagree
	MS17	18	Under this standard, we ask that the following is added: “(xx) Buildings and equipment shall be designed, constructed and maintained so as to minimize the risk of injury or distress.” and that MS 17 c) is changed to “All fittings and internal surfaces, including entry races and adjoining yards that may be used by the housed animals, must: 1.be constructed to ensure there are no hazards likely to cause injury to the animals. 2. not be treated with paints or wood preservatives which may be toxic to animals (to bring into line with European standards).	Disagree
	MS17 (b)	11	Conflicts with MS (h)	Agree, MS (h) removed
	MS17 (b)	23	Add “and for the minimum period possible.”	Agree, changed
	MS17 (e)	22	The word “airflow” is redundant as the required outcome is achieved by the inclusion of ‘ventilation’ in the standard	Agree, changed
	MS17 (f)	18	Should be changed to “If ammonia levels of <b>15</b> ppm or more are detected within the housing, immediate action must be taken to reduce the ammonia levels.” It is clearly not acceptable to allow ammonia levels of 25 ppm in	Disagree, consistent with other codes

			animal housing. A level of 15 ppm, easily detectable by smell, is an appropriate level for action to be taken to reduce levels.	
	MS17 (f)	25	We are concerned that there is no practical way for an inspector to measure ammonia levels. Will farmers have equipment to monitor levels and know when they must take action?	Disagree
	MS17 (g)	18	Be replaced with "The animals must not be kept permanently in strong light nor in total darkness. Artificial light sources must be mounted so as not to cause discomfort to the animals and the level of lighting whether natural or artificial must be sufficient to permit normal behaviour." The wording in the draft code does not preclude the possibility of animals being kept in strong light 24 hours per day. The suggested change is taken from the Council of Europe Recommendation for Cattle, Article 13.	Disagree, though wording changed
	RBP (b)	7	Suggest rephrase as "...dry material <i>that is comfortable for the animals to be on.</i> "	Disagree
	RBP (d)	13	Need to define lux in the glossary?	Agree, definition added
	RBP (f)	9	Think this needs an indicator of how to check the ammonia levels – is there a testing kit available?	Disagree
	Transport	12	Ensuring stock are transported for the shortest possible time: I have on a number of occasions seen stock trucks on the side of the road whilst the driver is eating or drinking. Stopping en route should be forbidden (except in extraordinary circumstances). Living on the Kapiti coast I see many, many transport trucks on our highway and some have unacceptably small air holes - the abandonment of the slatted sides where the air flow was reasonable should be stopped and more humanely designed carriers provided. The heat in these trucks compounded by many, many delays on State Highway must make the conditions for the animals insufferable. And this applies also to the transportation of animals across the Cook Strait. Are these animals supervised and cared for either en route or when they arrive in the South Island after incarceration?	Noted, this section is pre-transport selection, there will be separate transport code of welfare
	7.9	24	Suggest adding "and Management" to title as this section contains information about pre-transport management as well as selection.	Agree, changed
	MS 18 (a)	17	Will this person be required to keep any record of this inspection?	Noted
	MS 18 (a)	22	Given the existence of part (b), this requirement is redundant.	Disagree
	MS 18 (a)	24	Clarification is sought as to which person in charge –the farmer or the truckie?	Noted



	MS 18 (b)	22	It is suggested that “ <i>Where appropriate, a veterinarians certificate is obtained</i> ” is added at the end of the standard.	Disagree
	MS 18 (b)	24	There are circumstances when this is allowed provided that a veterinary certificate is obtained. Legally this standard would preclude this practice which we suspect is not the intended outcome.	Disagree, a veterinary certificate provides evidence that appropriate consideration of this MS has been given
	MS 18 (c)	23	Rephrase as “Animals in the last X weeks of pregnancy should not be transported,” with the time specified based on appropriate evidence.	Disagree, consistent with other codes
	MS 18 (d)	14	The use of electric prodders should not be included under “Selection”.	Agree, deleted
	MS 18 (d)	24	This requirement is not related to pre-transport selection and should be in another section of the code i.e animal handling. Suggest electric prodders must only be used on adult cattle or when a person’s life is in danger.	Agree, deleted
	MS 18	24	Standing off requirements need to be stated i.e. sheep and cattle should be off pasture for a minimum of 12 hours to empty out before transportation. Clean water should be available at all times.	Disagree
	MS 18	25	We submit that a new (e) be added: “No calf can be transported unless its naval cord has properly withered.” We are concerned that bobby calves are regularly being transported that are not robust enough to withstand the journey.	Disagree, not relevant for beef cattle
	RBP (a)		Rephrase as “should not be transported”	Agree, included as example indicators statement
	RBP (a)	7	The “psychological and weakness depression statements are not helpful as it would make a lot of cull animals unfit.	Disagree, but now included as example indicators statement
	RBP (a)	11	Delete as such animal would be unfit for transport under MS (b).	Agree, now included as example indicators statement
	RBP (b)	13	Suggest adding “A veterinarian can certify an animal as fit for transport, in which case the appropriate documentation accompanies the animal on its journey.” to end of statement.	Agree, added to Introduction
	RBP (c)	5	The transport sector supports including standing times, but would request that the words “green feed” be added in respect of pre-trip feeding e.g. (sheep &	Agree, changed

			cattle should be held off <i>green feed</i> pasture for a minimum of 6 hours etc).The reasons for requesting this change is that other industry organisations are now using the words off green feed when promoting standing livestock prior to transport.	
	RBP (c)	11	Believes that the RBP relating to pre-transport selection on page 39 of the code be revised to reflect the currently accepted standard of four hours off green feed prior to transport.	Disagree, though wording changed
	RBP (c)		Explanation is needed for this practice (presumably to empty the gut)	Disagree
	RBP (c)	22	Align this RBP with the <u>Minimisation of stock effluent code of practice</u> which states that “stock should be held off green feed for 4-6 hours before transport.”	Agree, wording changed
	RBP (c)	24	Recommend that the message is consistent with other groups i.e. sheep and cattle should be held off feed for a minimum of 4 hours before transport.	Agree, wording changed
	RBP (d)	20	No pregnant animal should be transported. They can be at the present time and I would make a submission that no pregnant animal should be allowed to be transported.	Disagree
	RBP (d)		A similar requirement is needed for sheep	Disagree
	RBP (d)	24	Is this consistent with other codes and current science?	Noted, yes
	RBP (e)	24	Rephrase as “should not be transported.” Recommendations are then needed on what should be done with them instead.	Disagree
	RBP (f)	23	Ramps also need good surfaces, such as cleats	Noted
	RBP (f)	24	This is not a “selection” RBP	Agree, section now includes management
	RBP (g)	24	This is not a “selection” RBP	Agree, section now includes management
	GI	11	These should be RBP’s if they are optimal.	Agree, wording changed
	GI Bullet point 3	5	This should be amended to read “ensuring animals have been emptied out before transport, but avoid dehydration or dehydration must be avoided”.	Agree, wording changed
	GI Bullet point 7	5	This comment is beyond the farmers control. There are many factors that can influence travel times that are well beyond the scope for a farmer or stock operator to control. The objective is laudable and every effort is made by persons transporting stock to meet that aim, but we don’t think there is any merit in having this appear in the text of the Code.	Disagree, though wording changed

	GI	23	Replace “Optimal” with “Good”	Agree, changed
	7.9	20	Comment pertains to transportation of animals: ‘At no time should the back unit be removed from the front unit of a transport truck and left standing on the side of the road with stock on board while the driver travels away to get more stock. This practice should become an offence’.	Noted
	7.9	14	Consideration of stockyards needs to be included. Thin ewes, shorn should be covered/ protected from wind and rain on the truck similarly to bobby calves. We have seen deaths at yards due to this. Very woolly sheep can die of overheating particularly in hot humid conditions in some numbers on stock trucks. Ventilation, ammonia, carbon monoxide fumes could be factors in some cases. Large animals densely penned is a factor.	Noted
	GI	11	Extremely concerned by the phrase that ‘might’ indicate that an animal was unfit to travel. With the exception of ‘weight loss’ animals exhibiting any of the signs would be unfit for travel and should not be transported without prior veterinary approval and certification. Request wording amended to make it clear that animals exhibiting any of the listed signs should not be transported.	Agree, now included as example indicators statement
	GI	13	The final paragraph repeats the introduction.	Agree, deleted
	GI	24	Some commentary needs to be included that there are cases where animals can be selected for transport, providing there is a veterinary certificate. This GI information should also be in the transport code.	Agree, added to Introduction
	Intro – para 1.	7	Must be made clear in the introductory paragraph of this section that cutting the throat is not humane for cattle.	Agree, wording changed
	Intro – para 1.	13	Suggest rephrase as “...damage to kill the animal (e.g. using a firearm) or render the animal insensible (e.g. with a blow or captive bolt pistol). In the latter case, death should be ensured by stopping the blood supply to the brain by then cutting the major blood vessels of the neck or sticking the major blood vessels in the chest and the heart. However,...” and delete the 2 <sup>nd</sup> paragraph.	Disagree
	Intro – para 2	7	Sticking in the chest is inhumane for cattle and sheep and shouldn’t be encouraged.	Disagree
	Intro - para 2	14	In attempting write a COW for two very different species, the wording of some states is contributing to a lack of clarity or even ambiguity. Is this COW suggesting that a blow to the head in cattle is acceptable, or cutting the throat of cattle (without stunning) is acceptable?	Disagree, though wording changed
	MS 19	2	Must identify death of the animal by touching the eye. Case of Ohakune farmer in court at the moment who ‘kicked the animal’ to identify death had	Disagree

			occured. Identification of death must be quantified to the layman by a physical means - ie - touching the eye ball to confirm death has occured.	
	MS 19	23	The title should be "Emergency killing." The aim is to make the process humane, not to assume this. And the term "slaughter" is sometimes restricted to killing for human consumption. Re-order (a) to (f) into a logical order	Agree, section changed to humane destruction Agree, order changed
	MS 19	24	My understanding is that there is a separate code for Slaughter, including emergency slaughter. This section should also cross reference the slaughter code.	Disagree
	MS19 (a)	7	Add sheep to this MS too and delete RBP (a). The throat cut if done properly in sheep would conform to this standard.	Disagree
	MS19 (a)	11	Suggest replace "supervenens" with occurs.	Agree, wording changed
	MS19 (a)	17	Add sheep to this MS.	Disagree
	MS19 (a)	23	Replace "rapidly" with "instantaneously"	Disagree
	MS19 (b)	17	Explain why.	Noted, MS deleted
	MS19 (b)	23	They should not be shot anywhere else inappropriate either. Specify where they should be shot (if they are to be shot), not where they should not be shot.	Agree, MS deleted
	MS19 (c)	11	Suggest replace "supervenens" with has occurred.	Agree, wording changed
	MS19 (c)	23	Replace the last three words with "until after death"	Agree, changed
	MS19 (c)	24	This goes against a very common practice Farmers will ignore this. Is there science to support this?	Noted
	MS19 (d)	11	Suggests is not necessary to bleed out an animal killed by a free bullet as it will cause sufficient brain damage to negate the requirement to bleed out. Bleeding out is necessary only in the case of a captive bolt gun. This requirement that all animals be bled out could be moved to include as a RBP, rather than an MS?	Disagree
	MS19 (f)	22	It is recommended that this be reworded as "Persons...must be competent in the handling and killing of sheep <i>and /or</i> beef cattle" to allow for the possibility the persons are able to slaughter both species of animal.	Agree, changed
	MS19 (f)	23	Omit "humane"	Agree, changed
	RBP	23	Again the clauses are in an illogical order. In particular, how does (e) fit with the other clauses?	Disagree
	RBP (a)	11	Why should sheep be treated differently?	Disagree

	RBP (a)	23	Replace “rapidly” with “instantaneously.” This should be in the Minimum Standard.	Disagree
	RBP (b)	7	Suggest rephrase as “... knives <i>must</i> be sharp)...( <i>e.g. cartridge strength of captive bolt or caliber of firearm</i> ).”	Agree, changed Disagree
	RBP (d)	1	A shotgun with solid slugs was recommended by Blackmore et al to kill adult cattle. This submitter has personally used this method.	Disagree
	RBP (c) and (d)	17	Explain why.	Noted
	RBP (d)	23	In the UK, shotguns with 9mm lead slugs are accepted as a humane way to kill cattle.	Disagree
	RBP (d)	24	We have received a comment that shotguns should never be used to destroy any animals. Is this consistent with the emergency slaughter code?	Disagree
	GI para 1	23	Replace “does not affect” with “increases”	Disagree
	GI para 3	23	Add “and other people”	Disagree
	GI para 4	23	Should the hygiene implications of penetrative bolts (e.g. for BSE) be discussed?	Disagree
	GI	11, 24	Picture is of a horned sheep, for hornless sheep example.	Agree, figure changed
<b>Appendices</b>		22, 23	All the references to appendices within the text are numbered wrongly.	Agree, changed
	Appendix I	10	No mention of condition score of 0. Add in: “Condition score 0: This is seldom used as it only applies to sheep that are severely emaciated and on the point of death.”Also add in: “Half scores are commonly used.”. A score of 0 is normally included so this would bring it into line with other publications (eg. The NZ Sheep Council 1994 Publication “A Guide to Feed Planning for Sheep Farmers”, and Russel et al. (1969), <i>Journal of Agricultural Science, Cambridge</i> , <b>72</b> : 451-454.) Without this added score the reference on p 14 to BC scores falling below 1 does not make sense.	Agree, changed
	Appendix I	14	The diagrams used in this appendix are dated and deceptively misleading. A more “indicative” drawing of BCS 1 would show sunken or minimal “eye muscle” rather than a full and rounded eye muscle as drawn in these diagrams.	Noted
	Appendix II	13	Is the 2nd paragraph necessary here? In MS 5 and the glossary, the scale is given as 1-10 (not 1-9 as stated in para 3).	Agree, scale changed
	Appendix II	13	Picture of a beef cow?	Agree, changed

	Appendix II	13	Diagrams are worth a thousand words!	Noted
	Appendix II	24	The body condition score is using a dairy animal as a guide when referring to beef animals, dairy and beef store their fat differently I'm not sure its appropriate guide.	Agree, scale changed
	Appendix III	4	Average and peak requirement headings are out of alignment.	Noted, Appendix deleted
	Appendix III	11	What about water requirements for lactating beef cows?	Noted, Appendix deleted
	Appendix III	22	The tab setting for the "estimates of average..." heading is faulty.	Agree, though Appendix deleted
	Appendix III	24	Needs a covering statement to provide adequate feed.	Noted, Appendix deleted
	Appendix IV	24	<p>Too restrictive and not in line with current practice.</p> <p>As discussed there are number of issues with the Appendix received. In short the parameters documented would make most intensive feedlots unworkable. Can I suggest there is greater consultation with people with expertise in intensive feeding systems.</p> <p>Consideration needs to be given to whether optimal production or welfare is the driver behind these parameters. If Welfare is the key factor then we only have to worry about keeping the animal at or above maintenance feeding levels. Also the time on the pad, type of feed, accessibility to feed over a 24 hour period and water delivery speed are key factors.</p> <p>With regards to space requirements this will be determined by underfoot conditions, time on the pad and drainage. With the exception of the Indoor lamb feedlots (0.33) all of the others are too generous and would be restrictive. For example many indoor cattle feedlots operate at 7m<sup>2</sup> per head. 5-10m<sup>2</sup> for outdoor lambs is ridiculously high.</p> <p>Access to feed is not solely driven by feedbunk space. The volume of feed stored in the feeding system , the energy concentration of the feed and the number of times feed is delivered is just as important as feed bunk space. For example some self feeding systems in Australia will store several days of feed which is delivered on demand. This has a feeding space of 6m and will accommodate 60 head consuming at least 2 times maintenance requirement i.e. 100mm per head. At Five Star Beef the bunk space is 266mm per head and the cattle often consume at 3 times maintenance. The bunk space could be a lot less if designed for welfare not production. Instead of putting absolute</p>	Noted, Appendix deleted

			figures on feeding space the code could state "All animals should have sufficient quantity and quality of feed to sustain or increase body weight" With regards to water this is determined by trough volume (storage), water delivery speed, feed dry matter and climate as much as by trough space. The lamb space is extreme as for every 1000 lambs 100m of trough space would be required. There would not be many farms in NZ would comply with this. Five Star Beef would also be non compliant. It may be better to state that there be no crowding of animals at at water facilities for longer than 3(?) consecutive hours.	
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#### Appendix V. Interpretation and Definitions

	<b>Current situation or place in the code</b>	<b>Suggested change or expansion</b>	<b>Reason for the suggestion</b>	<b>NAWAC response</b>
17			Why include terms which do not appear elsewhere in the Code, such as 'feral animal', 'ad lib' or 'pest'? Even 'good practice' does not occur in the body of the draft.	Disagree
22	<b>animal</b>		It is unnecessary, in the context of this document, to include the full definition of the word 'animal'.	Disagree
10	<b>body condition score</b> A 1 – 10 for cattle, and 1 – 5 for sheep....	<b>body condition score</b> A 1 – 9 for cattle, and 0 – 5 for sheep, scoring system....	To bring it into line with the previous suggestion, and with the fact that the scoring system for cattle on pp. 44-45 is from 1 to 9.	Agree, scale changed
10	<b>break-feeding</b>	"...to a set amount or area of standing pasture or crop on a frequent, often daily, basis. Also commonly referred as strip grazing."	Specifying the amount only, means it could have been harvested.	Agree, wording changed
13	<b>cast</b>	"...into a <i>sternally recumbent</i> position..."		Disagree
13	<b>crutching/ dag/ dagging</b>		"hindquarters" not strictly true here or in the following two. Perineal area?	Disagree
10	<b>Dag</b>	"...A clot of matted wool or hair and excrement..."	Dags are formed on cattle as well as sheep.	Agree, though wording not changed
24	<b>drought</b>		The definition of drought is different to that used by the met service and that	Disagree

			used by MAF in considering drought assistance. This should be reviewed to ensure consistency.	
10	<b>feral animal</b>	An animal existing in a wild or untamed state, or an animal of a domestic species now living in a wild state.	To cover feral animals that have never been domesticated.	Disagree
10	<b>flight zone</b>	The space around an animal (and particularly in front of an animal), which, if entered by a stock handler, will cause the animal to move or take flight.	The current version is not strictly correct.	Disagree
13	<b>good practice/ recommended best practice/ scientific knowledge</b>	“NAWAC takes <i>this</i> to mean...”		Disagree
10	<b>heifer</b>	The on-farm definition is usually of a young female bovine up to the time it produces its first calf. For carcass classification purposes heifers are female cattle having no more than six permanent incisors, which means up to about 3 years of age.	Both the on-farm definition as well as the carcass classification definition should be included to avoid confusion.	Disagree
10	<b>hogget</b>	Delete “female” as there are also ram and wether hoggets. Note that for carcass classification purposes a hogget is defined as a young male sheep or maiden ewe having no more than two permanent incisors in wear.	Both the on-farm definition as well as the carcass classification definition should be included to avoid confusion.	Disagree
11, 13, 24	<b>kea</b>		This is the only place that 'kea' is mentioned. Not required in this code	Agree, deleted
7	<b>mulesing</b>			Disagree
10	<b>lamb</b>	This is a common on-farm definition, but for carcass classification purposes lambs are young sheep under 12 months of age or which do not have any permanent incisor teeth in wear.	As for hogget	Disagree
10	<b>neonate</b>	“Young” is very vague. Maybe something like “within a few days of birth.” For human babies it is usually considered the first 4 weeks after	To avoid vagueness.	Agree, wording changed



		birth, but for lambs and calves a period of 3 days after birth is commonly used.		
13	<b>neonate</b>		Needs further definition	Agree, wording changed
13	<b>painful husbandry procedures</b>	“Any procedure...”		Disagree
10	<b>pasture</b>	“A mix of grass, clover and other plant species...” Add in: “Also commonly referred to as herbage”.	Pastures are not usually grass only.	Disagree
10	<b>physiological state.</b>	A state of the animal with particular features regarding the functioning of the body, its organs and body systems. Examples of physiological states that differ from “normal” include lactating state, pregnant state, various forms of diseased state, stressed state, aroused state, exhausted state, starved state, emaciated state, etc.	The current definition is too vague, and does not really describe a state.	Disagree
2	<b>rectal bearings</b>		‘Rectal bearings’ must also be mentioned in glossary as these are common.	Disagree
10	<b>stock</b>	All farmed sheep or beef cattle for the purpose of this code. Sometimes referred to as livestock.	Not currently defined.	Disagree
10	<b>stockmanship</b>	A measure of a person’s ability to consistently put into practice the skills, knowledge, experience, attributes and empathy necessary to effectively manage stock.	Places emphasis on the fact that this is a personal characteristic of the stock person.	Disagree

Note: Editorial comment on hardcopy of code also considered from submissions 7, 11 and 13.

#### Response to specific questions

Qn	Submission	Comment
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Qn1	5, 6, 8, 9, 11,	1. <i>Do you consider a code of welfare for sheep and beef cattle to be necessary?</i> If not, what alternative(s) do you consider to be required?  Yes, definitely should have one. Code is a sound foundation for ensuring animal welfare considerations are met by those managing stock.
	15	In the absence of comprehensive Industry Codes this code is desirable.
	20	I consider a code of welfare to be an important and necessary requirement for both sheep and beef cattle.
	21	In the current climate where public are becoming increasingly aware of how food is produced, a code of welfare for sheep and beef is a logical way to ensure that those who farm animals for food do so in a way that is acceptable to the end user.
	23	Yes. Welfare Codes have proved highly effective in New Zealand and in all other countries that have them.
	24	Yes, a code of welfare for sheep and beef cattle is necessary to document the animal welfare practices that are being carried out by New Zealand sheep and beef farmers and to provide guidance to sheep and beef farmers on minimum standards and best practice.
Qn2	8, 9	2. <i>Do you agree that sheep and beef cattle should be covered in one code?</i>  Seems sensible provided code is clear about differences where these exist.
	11	Would prefer to see separate codes for sheep and beef cattle however it is recognized that the final decision should rest with those who will be directly affected by the code (those in the sheep and beef industries)
	13	Although a canvassing of members of the Sheep and Beef Special Interest Branch of the association indicated a marked preference for separate codes for sheep and beef cattle and made this known to the code-writer, we accept that this code is now probably too far down the track to change its combined format.
	14	My impression after reading this draft is that the inclusion of two species in the one COW is not entirely successful nor in hind sight appropriate. While "sheep and beef" farming is a common entity, the welfare needs and concerns of each of these species within this single entity are at times separate and can be quite distinct. Trying to combine both needs into a single statement has in places lead to lack of clarity and even potential ambiguity. In hind sight, I would recommend that a separate COW for both Sheep, and for Beef cattle would be more appropriate.
	15	The inclusion of beef and sheep in the one code does seem to lead to some lack of clarity/succinctness ..I'd prefer to see them separated.
	20	I do not agree that sheep and beef cattle should be covered in the one code. This is because of the difference in the two animals physical, health and behavioural needs.
	21	A single code covering sheep and beef cattle is logical as many of the first principles are applicable to both species.
	23	We have no strong opinion on this. There do not seem to be major problems with this approach in this draft, although it is possible that the Code will become less manageable when more specific recommendations (many of which would be different for the two species) are included, as we argue below is needed.
	24	Yes, one code is sufficient to cover sheep and beef cattle as there is a high likelihood that if a farmer runs sheep they will run beef cattle and vice versa. Therefore management practices including animal welfare will be similar, therefore addressing them

		through one code makes sense. However it is important to ensure that overly onerous standards are not imposed in order to encompass both species in one code.
Qn3	9,13,20	<p><i>3. Do you agree that the minimum standards in this code are the minimum necessary to ensure that the physical, health, and behavioural needs of sheep and beef cattle 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 alternatives do you suggest? Please state your reasons.</i></p> <p>Yes agree - think that the minimum standards are the minimum necessary and reflect good practice.</p>
	10	Make code more user friendly by having Minimum Standards listed at the front (or back) of the publications where they are readily accessible, possibly as well as in their current positions. If they are put at the front or back, there should be a cross-reference to the page number of the relevant section within the code.
	11	Suggest that MS's are combined into a single document with species specific standards issued as supplements. Suggests that this will reduce size and complexity of codes and also speed up consultation process. Noted that they are of a similar nature to those contained in other Codes of Welfare.
	14	Minimum Standards in some cases are reduced to "best practice" and "best practice" in many cases is not that – it is merely a statement of what is and should be current practice and basic husbandry practices.
	15	In many cases, the minimum standards are not sufficiently comprehensive or measurable (see attachment) to adequately protect the welfare of livestock. The minimum standards do not generally reflect 'good' practice.
	17	My submission is that the minimum standards contained in this draft code, which are supposed to be the legally relevant sections with 'teeth', are for the most part not 'quite detailed' as they are intended to be and in many cases are in fact so nebulous as to be largely meaningless. (Examples are given – refer to submission for further detail). By way of a suggested alternative to the provisions of the draft Minimum Standards, it is recommended that these be re-written to significantly increase their specificity and quantification.
	21	The minimum standards in the code generally appear to be reasonable in terms of ensuring that the stated needs of sheep and beef cattle are met.
	23	The general approach of listing minimum standards and best practice separately seems reasonable. However, there are two particular problems with this draft. First, many of the recommendations in both lists are general rather than specific. Second, many of the so-called best practices are necessary to achieve the minimum standards (see, for example, the comment below on MS1 on p7).
	24	Yes, the minimum standards represent good practice that is also current practice. Specific recommendations on changes to wording are included here as comments in each section of the draft. The extensive development of this code through consultation with farmers and researches supports this statement.
Qn4	8	<p><i>4. Do you agree that the recommendations for best practice in this code are appropriate? If not, what alternatives do you suggest? Please state your reasons.</i></p> <p>I think more specific guidance on artificial rearing of calves would be helpful, particularly aimed at the small-scale 'lifestyle block' rearers rather than the dairy farms. Some of those small-scale rearers have no idea of how far they are deviating from natural (cow raised) rearing and especially feeding practices and seem to take pride in getting the calf off milk at a very young age - as if</p>

		being weaned at 8 weeks means it's a particularly fine calf and they've done a particularly good job of rearing it. Unlike (good) dairy farmers, they often don't have the knowledge to do this well. There also seems to be a small (I hope) but emerging trade in very young and no doubt very cute beef calves being sold as pets/paddock ornaments who have no knowledge of how to feed the calf.
	9,20	Yes – best practice are appropriate.
	14	The impression from reading this COW is that there is a general “dumbing down” or lowering of stated standards. Best practice should be a level above what is “current practice”. These “best practice” statements are in most cases statements of what should be current, standard and normal practice that should already be in common use.
	21	See specific suggestions for rewording below
	23	The general approach of listing minimum standards and best practice separately seems reasonable. However, there are two particular problems with this draft. First, many of the recommendations in both lists are general rather than specific. Second, many of the so-called best practices are necessary to achieve the minimum standards (see, for example, the comment below on MS1 on p7).
	24	Yes, the best practice recommendations in this code are appropriate however the code needs to be flexible enough to allow changing practices in the future.
Qn5	9	<i>5. Do you agree with the recommended maximum times off feed (e.g. Food and Water, Shearing, Pre-transport)? NAWAC notes other guidelines (e.g. transport company guidelines) may give minimum and maximum times but they may not have considered best practice on welfare grounds.</i>  Yes - I am not experienced in this area, so assume the veterinarian consultants have made appropriate determinations.
	11	Believes that the RBP relating to pre-transport selection on pg 39 of the Code be revised to reflect the currently accepted standard of four hours off green feed prior to transport.
	20	I do not agree with 3. RBP (a). I would submit that an animal in ill health or poor condition, or in late pregnancy or early lactation, should have food and/or water available at all times.
	21	The maximum times are acceptable. If animals are being consciously deprived from food and water for management reasons, best practice should include providing shade where possible during hot weather.
	24	Standing off requirements need to be stated i.e. sheep and cattle should be off pasture for a minimum of 12 hours to empty out before transportation. Clean water should be available at all times.
Qn6	9	<i>6. How, and to what extent, do you think this code would change existing arrangements for the management of sheep and beef cattle?</i>  I think it depends on individuals' farming practices as to how much the code will change what is done. Farmers need to be made aware of the details of the code in order to work towards achieving best practise.
	15	The code as written probably wouldn't alter existing management of livestock.
	20	In making my submissions I believe it is important that the Animal Welfare (Sheep and Beef Cattle) Code extends as widely as possible and covers all aspects of welfare pertaining to Sheep (and Beef Cattle) and making comparisons with existing arrangements serves no purpose. I fully understand the need for the highest animal welfare code to be practiced and to be met

		to ensure New Zealand's reputation is held in high regard. I live on a main tourist route in a strong farming district and consider it is essential for every element of animal welfare to be strictly followed. If it is not New Zealand's meat and wool export trade will without doubt suffer the consequences.
	21	Because AgResearch is a pastoral agricultural research organisation we have in place comprehensive operational policies to cover animal health and welfare. We do not foresee this document changing our existing arrangements.
	23	In its current form, this Code would not change existing management of sheep and cattle very much, because it mostly states general principles. It is easy to claim compliance with such principles and difficult to demonstrate non-compliance. More specific guidelines for management are needed if change is to be achieved (see, for example, the comment below on feeding on p13). One important aspect missing is any indication of surveillance, overview or involvement of external authorities in production practices or decision-making. See, for example, the comment on p27: we point out that any genetic gains to be made by invasive reproductive technologies must be justified in balance to the welfare problems caused. But who is to make such a judgment?
	24	The requirements of this code should be documentation of good current farming practice and therefore there should be no significant changes.
Qn7	9, 20	<i>7. 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.</i>  No direct effect on me or my business.
	13	We do not see that there will be substantial costs to the farming community arising out of the code.
	21	AgResearch does not believe that this code will impinge on compliance costs.
	24	The requirements of this code should be documentation of good current farming practice and therefore there should be no significant changes.
Qn8	7	<i>8. What benefits do you see from having this code? Benefits may include increases certainty about animal welfare requirements or market gains.</i>  I believe that apart from informing owners of their legal obligations, the Codes can be useful training aids for anyone who is serious about farming sheep and beef cattle well. Codes such as these are particularly useful for Inspectors undertaking animal welfare investigations. They can be use to demonstrate to errant owners that they are required to meet specific minimum standards of husbandry. Most AW investigations don't end up in court, many are resolved by on farm education and/or encouragement of apathetic or neglectful owners, and well-written and comprehensive Codes such as this one have a very useful part to play in this. It is pleasing to see this stated in the first paragraph.
	9	Good to remind and inform farmers, and especially 'lifestyle farmers', who sometimes have little knowledge of animals' needs, such as requirement for drench, crutching, or shearing (there are plenty of sheep on lifestyle blocks with full-fleece in summer). Important to make all (including non-owner caretakers) aware of their obligations in terms of welfare and day to day practise.
	11	Increased understanding for farmers around what is required to meet their obligations under the AWA 1999. Believes that he Code, if appropriately enforced and revised, will have a (generally) positive impact on the welfare of sheep and beef animals farmed within New Zealand.

	13	The benefits to animal welfare are clear, and we understand the advantages in terms of market perceptions and international trade that follow on from having appropriate welfare standards for our farmed animals.
	20	Yes, I totally agree with the benefits derived from this code, including increased certainty about animal welfare requirements and market gains.
	21	The benefit from having this code is most likely to come from continued or improved market access. However, this will not be realised unless the fact that the code exists is promulgated widely. Many of our trading partners are becoming more aware of animal welfare requirements, and the fact that we have a code of welfare for farmer animals will be viewed positively. But, there is potential for the code to have a negative impact in some cases. The recommendations and the best practice, by definition, predispose to an extensive pastoral based production system. There are some market sectors who do not like the fact that animals in New Zealand are expected to stay outdoors in all weather extremes. This code will also advertise the fact that this is a significant management strategy in New Zealand.
	24	Farmers have something to use for processors farm assurance programmes. The Code may also provide guidance where required on minimum standards and best practice for animal welfare. Processors have a tool to demonstrate to customers the minimum animal welfare standards in NZ.
Qn9	9	<i>9. What other impacts would this code have on New Zealand society, the economy, or the environment?</i>  One important impact on the environment is how effluent is removed and disposed of from stand-off pads.
	11	All impacts of the code are likely to be similar to those of other CoW's already in existence.
	15	The code should be extended in terms of minimum standards and their measurability if the code is to have tangible benefits for AW, citizen agreement and market positioning of products.
	20	The code will have positive benefit to New Zealand which must be constantly aware of the need to meet the highest animal welfare code to preserve its export requirements.
	21	AgResearch does not see any significant impacts on the economy or environment. The introduction of the code may be viewed differently by different sectors of society: i. Those who will need to be aware of the code may view it negatively, as it is a very long document. ii. It would be hoped that those who may have an interest in the welfare of farmed animals will view it positively. iii. Those who have a strong negative attitude to farming animals for food may have a (vociferous) opposition to the code and express this by drawing attention to the parts of the code that acknowledge the potential for farming systems, especially when combined with environmental challenges that cannot be manipulated, to compromise the welfare of farmed animals from time to time.
	23	We believe that most of the improvements in welfare that this Code is intended to achieve will be cost-neutral or beneficial for companies. We note that while livestock businesses have legitimate concerns before introduction of such Codes, most welcome them once they are in place and find compliance makes a useful contribution to their operations, especially when combined with publicity about that compliance. Welfare Codes are also an important part of the positive approach that New Zealand has taken to welfare and environmental aspects of animal agriculture, and therefore an essential element in the continuing success of the New Zealand agricultural sector.

	24	The Code has the potential to provide greater standing in the international arena and enabling us to support our claims in the export market.
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