



# Submission

*15 July 2025*

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**Ministry for Primary Industries**

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**Proposed changes to the Code of  
Welfare for Sheep and Beef Cattle**

BY

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**Beef + Lamb New Zealand Ltd**

## About Beef + Lamb New Zealand Ltd

Beef + Lamb New Zealand Ltd (B+LNZ) is the farmer-owned organisation representing New Zealand's sheep and beef farmers. B+LNZ is funded under the Commodity Levies Act 1990 through a levy paid by producers on all cattle and sheep commercially slaughtered in New Zealand. B+LNZ's purpose is to provide insights and actions that drive tangible impact for farmers.

The New Zealand sheep and beef sector is a vital driver of the New Zealand economy and its prosperity. It is New Zealand's second largest export sector and one of the largest employers in New Zealand, accounting for 92,000 jobs, or almost five percent of the fulltime workforce.

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## Summary

As a significant stakeholder in the livestock farming industry B+LNZ appreciates the opportunity to provide feedback on the draft Code of Welfare for Sheep and Beef Cattle.

We appreciate the hard work and clear effort and thought that the National Animal Welfare Advisory Committee (NAWAC) has put into updating the code in a way that seeks to protect the animal welfare of our animals, but that is also practical and reflects farmer practice.

Animal welfare is very important to our farmers, and it underpins the trust that consumers have in the red meat products that New Zealand produces.

B+LNZ works to promote good animal welfare as an intrinsic part of productive, sustainable and profitable livestock farming, guided by the following principles:

- Good welfare must be promoted
- Poor welfare must be prevented
- Interventions should be proportionate and focused on outcomes
- Interventions should be based on scientific evidence and/or established husbandry expertise
- B+LNZ has a role in educating levy payers regarding regulatory requirements and encouraging good animal welfare; it is not involved in enforcement activities.

In order to provide feedback on the draft code B+LNZ sought feedback from farmers. We hosted two webinars, engaged a focus group of regionally elected farmer councillors, and invited feedback through our website.

In general, there was positive feedback from farmers about many elements of the code.

There were, however, some areas that farmers felt were too prescriptive or would be impractical to apply; or which were unclear or unnecessary given New Zealand's farming practices.

This submission focuses on the issues about which farmers had the most concerns.

We have attempted to explain the farmer's practical concerns and offer alternative language in a number of areas that we believe meet the intent of what NAWAC is trying to achieve, but be able to be practically applied on farm.

## Part 1: General Requirements

### 1.1 Application

B+LNZ appreciates the inclusion of Dairy Sheep into this code as recognition of this growing industry and the similarities in husbandry practices between dairy sheep farms and traditional meat and wool producing sheep farms.

B+LNZ has identified a potential lack of clarity in the application of the Code to calves born from dairy cows raised for beef, and recommends that in Part 6.10 (artificial rearing) it be made explicit that the Code applies to orphaned beef calves only – see this section below.

### 1.2 Interpretation and Definitions

B+LNZ is satisfied that the list of definitions provided in the proposed Code is sufficient.

## Part 2: Stockpersonship and Animal Handling

### 2.2 Animal Handling

#### Minimum Standard No. 2 – Animal Handling

- a) Sheep and beef cattle must be handled in such a way as to minimise the risk of pain, injury or distress.
- b) Only the minimum force required must be used when moving sheep or beef cattle.
- c) When moving sheep or beef cattle using a vehicle, animals must not be struck by the vehicle.
- d) Dogs must be under effective control at all times.
- e) When dogs are catching sheep for treatment purposes, dogs must not cause bruising or pierce the skin.

B+LNZ acknowledges the intent of this part of the code.

2.2.1 Minimum standard 2(e), however, raises concerns with farmers:

- The practice of using a dog to catch sheep for treatment purposes is invariably undertaken for life-saving interventions such as the treatment of a prolapse (bearing) or to correct a dystocia at lambing. It is argued that even if a small amount of bruising occurs, the end justifies the means in these cases.
- As well trained as any dog can be, the farmer has no control over the actions of the sheep being caught in these situations. A belligerent or panicked animal may cause or exacerbate injuries to itself regardless of the training or skill of the dog.
- B+LNZ acknowledges the issue NAWAC are trying to address but recommends that MS 2(e) be removed and replaced with a Recommended Best Practice such as “When a dog is catching a sheep for treatment purposes, the dog must be trained to do so without causing severe injury to the sheep and be under effective control at all times (MS 2(d))”.

## 2.4 Restraint

### Minimum Standard No. 4 – Restraint

- a) Restraint must be applied in such a way as to minimise stress and risk of injury to sheep and beef cattle.
- b) The method of restraint must be suitable for the class of sheep or beef cattle being restrained and all relevant facilities and equipment must be maintained in good working order.
- c) Stockpersons must be fully conversant with the safe operating procedures of restraint equipment.
- d) Restraint must be applied only as long as necessary to perform a particular procedure.
- e) Sheep and beef cattle that are physically restrained must be kept under close supervision at all times.
- f) Nose rings and equipment used for beef cattle restraint must be fit for purpose.
- g) Sheep and beef cattle must not be permanently tethered.
- h) Sheep and beef cattle that are tethered, other than for husbandry procedures:
  - i. must be trained to the conditions;
  - ii. must be able to lie down, get up, walk and move around without undue hindrance;
  - iii. must be inspected at least once every 12 hours; and
  - iv. must have access to feed, water, a well-drained comfortable lying surface and effective shelter at all times.

B+LNZ acknowledges the following inclusion in the discussion document:

### Matter indicated for regulation – will not appear in the final Code:

*NAWAC recommends that the use of electroimmobilisation devices be prohibited by regulation. The Committee does not anticipate any adverse effects that would result in an unreasonable impact on the sector. This regulation would not apply to immobilisation devices used post-stunning at slaughter premises.*

B+LNZ supports the prohibition by regulation of electroimmobilisation devices for use on New Zealand farms.

## Part 3: Water and Feed

### 3.2 Feed

#### Minimum Standard No. 6 – Feed

- a) Sheep and beef cattle must receive sufficient quantities of feed and nutrients to enable them to:
  - i. maintain good health;
  - ii. meet their physiological requirements; and
  - iii. minimise the incidence of metabolic and nutritional disorders.
- b) Stockpersons must ensure that the type of feed and the method of feeding and feed storage are appropriate to the farm system.
- c) Feed must be provided in such a way as to minimise competition.
- d) Automated feeding systems must be monitored and physically checked daily to ensure they are in working order and any problems rectified promptly.
- e) If the body condition score of any individual
  - i. beef animal falls below 3.5 or goes above 7 (on a scale of 1-10), or
  - ii. sheep falls below 2 or goes above 4 (on a scale of 0-5);remedial action through improved nutrition, husbandry practice or veterinary attention must be taken to remedy and prevent further deterioration.
- f) Where a change of feed is incorporated into the diet, it must be introduced gradually and abrupt changes must be avoided.

B+LNZ acknowledges the intent of this part of the code.

Farmer feedback to B+LNZ regarding MS 6(e) has been varied, with some accepting the new Body Condition Score (BCS) ranges but others suggesting that a lower threshold for sheep of 2 is too high.

B+LNZ accepts MS 6(e) on the understanding that the following are taken into account:

- At certain times of the year extensively farmed ewes will commonly exhibit a BCS of or around 2, and there is concern among farmers that this may appear to the untrained or inexperienced eye to be a failure on the part of the farmer.
- Farmers noted that weather events such as drought may result in reduced BCS and hinder the efforts of farmers to provide “remedial action through improved nutrition”.

Feedback on MS 6(f) has been varied also. In particular, farmers are concerned that the provision of emergency feed or fodder during extreme weather events may contravene this standard.

B+LNZ’s recommendation is that MS 6(f) is removed and replaced with an Example Indicator such as “Where a change of feed is incorporated into the diet, it should be introduced gradually and abrupt changes should be avoided.”

## Part 4: Behaviour

### 4.1 Behavioural Needs for Sheep and Beef Cattle

#### Minimum Standard No. 7 – Providing for Behavioural Needs

- a) Sheep and beef cattle must have sufficient space and the opportunity to satisfy a range of behavioural needs appropriate to their species, sex and season. These include foraging and opportunity for food selection, positive interactions with other animals, withdrawing from aggressive interactions, grooming, playing and rumination.
- b) Sheep and beef cattle must have access to a surface that allows them all to lie in a natural position and rest comfortably for sufficient periods each day unimpeded by mud, surface water or manure accumulation.

B+LNZ notes and appreciates the recognition in the proposed code that “Most sheep and beef cattle are farmed in extensive systems, allowing them the opportunity to display a wide range of normal behavioural patterns. In situations such as mustering and yarding, behaviour is usually restricted for only short periods of time.”

B+LNZ’s interpretation of MS 7(b) is that the key point is for livestock to have access to a surface “that allows them all to lie in a natural position and rest comfortably for sufficient periods each day unimpeded by mud, surface water or manure accumulation”, while recognising that at any point in time some of the flock or herd may choose not to utilise it. We believe this is an important point that we have made explicit in a B+LNZ Factsheet: “Winter forage crops: management during grazing” (2024).

### 4.2 Mixing Sheep or Mixing Beef Cattle

#### Minimum Standard No. 8 – Mixing Sheep or Mixing Beef Cattle

- a) When mixing sheep or beef cattle, they must be managed to prevent injuries to themselves and other animals.
- b) When mixing sheep or beef cattle, they must be provided with sufficient area and with a non-slip surface so that newly introduced animals can escape aggressive individuals.
- c) Sheep and beef cattle that do not adjust to a new group must be provided with alternative management.

B+LNZ suggests that the wording of this minimum standard should be clarified, as farmer feedback has identified confusion over what is meant by “mixing sheep or beef cattle”.

B+LNZ’s recommendation is to replace all instances of “mixing sheep or beef cattle” with “mixing mobs of sheep or mobs of beef cattle”.

## Part 5: The Physical Environment

### 5.1 Shade and Shelter

B+LNZ notes the inclusion of “selecting genotypes, strains or breeds of animals that are most suited to the local conditions and farming system” as an approach to addressing thermal stress, as well as the inclusion of “vegetation (e.g., scrub, tussocks, trees, shelter belts, rushes), or topography (e.g., rocks, ridges, gullies)” and agrees that these should be recognised as important sources of shade and shelter for livestock.

#### Minimum Standard No. 9 – Shade and Shelter

- a) Sheep and beef cattle must be provided with the means to minimise the risk of thermal stress.
- b) Where environmental conditions are likely to lead to adverse health or welfare outcomes, prompt remedial action must be taken.
- c) Where sheep and beef cattle develop health or welfare problems associated with exposure to adverse weather conditions, prompt remedial action must be taken to minimise the consequences of such exposure.
- d) Newborn lambs and calves that have been removed from their dam must be provided with shelter from weather conditions that are likely to compromise their welfare.
- e) Artificially reared lambs and calves that are moved from rearing facilities must be provided with shelter from weather conditions that are likely to compromise their welfare.

B+LNZ acknowledges the intent of this part of the code.

Regarding the associated Recommended Best Practices (RBPs) under this area (note we have not included the full text from the code for brevity purposes):

- RBP (b): “Calves and lambs born during cold or wet weather should be provided with shelter and heat where appropriate to increase vigour and reduce thermal discomfort” is confusing, as it appears to suggest that neonates should be removed from their dam during wet weather. This is contrary to the established practice of allowing the dam to provide milk and warmth for its offspring and would lead to significant complications when re-introducing the neonates to their dams. B+LNZ recommends this RBP be deleted.
- B+LNZ recommends RBP (c): “Where possible, calves and lambs should be moved back to the rearing house in adverse weather conditions” should be reworded to specify that this only applies to artificially reared calves and lambs.

## 5.2 Farm Facilities, Equipment and Technologies

### **Minimum Standard No. 10 – Farm Facilities, Equipment and Technologies**

- a) All facilities, equipment and technologies including fences, yards, sheds and housing, must be fit for purpose, regularly checked and maintained.
- b) Sheep and beef cattle that do not adapt to new technologies must be provided with alternative management.
- c) Training using new equipment and systems must enable sheep and beef cattle to learn without causing unnecessary distress.

B+LNZ acknowledges the intent of this provision in the code.

With respect to the Recommended Best Practices – B+LNZ notes that RBP (a) refers to a maximum slope for loading ramps for calves. This appears to have been lifted directly from the Code of Welfare for Dairy Cattle.

As beef cattle calves remain on-farm with their dam until weaning, this sentence is redundant and B+LNZ recommends it be deleted.

## 5.3 Off-Paddock Facilities

### Minimum Standard No. 11 – Managing Sheep and Beef Cattle in Off-Paddock Facilities

- a) All off-paddock facilities where sheep and beef cattle are kept, except off-paddock facilities used for sheep brought in for shearing, must comply with the following:
  - i. Natural or artificial ventilation must be sufficient to maintain temperature and humidity levels that do not cause thermal stress and prevent the build-up of harmful concentrations of dust or noxious gases.
  - ii. If ammonia levels of 15ppm or more at head level of lying sheep and beef cattle are detected within the housing, remedial action must be taken to reduce the ammonia levels.
  - iii. Lighting must allow animals to see and interact with each other and their surroundings.
  - iv. Natural and/or comparable artificial lighting must be at least 50 lux during the light phase, for a minimum of nine continuous hours and a maximum of 18 hours each day, so that sheep and beef cattle can see each other and their surroundings.
  - v. Where artificial lighting is provided to alter the diurnal light pattern, lighting levels must be between 160-215 lux for no more than 16 hours per day.
  - vi. Automated systems, including for feeding, water reticulation, cleaning, and milking, must be checked daily and provisions must be made to safeguard animal welfare in case these systems fail.
  - vii. Provisions must be in place to separate sheep and beef cattle needing attention or to quarantine sick animals.
  - viii. If stones are used as a surface cover or bedding in off-paddock facilities, they must not inhibit lying, walking or play.
- b) Sheep and beef cattle kept in off-paddock facilities, except off-paddock facilities used for sheep brought in for shearing:
  - i. must be inspected at least twice daily and timely preventative or remedial action taken to address identified problems.
  - ii. must be trained or allowed to adapt to housing before being confined to it, and individuals that do not adjust must be provided with alternative management.
  - iii. must be penned in groups, with individual confinement restricted to those under treatment for ill health, injury or disease for the minimum period possible.
  - iv. Sheep and beef cattle with horns or known to be aggressive must be penned separately.
- c) Where ewes and beef cows give birth in housing, the stocking density and facility design and management must allow sheep and beef cattle to separate themselves for lambing/calving, or they must be separated to another area to give birth.

B+LNZ acknowledges the intent of this provision.

With respect to the following example indicator “Sheep and beef cattle are trained to the conditions and housing system” B+LNZ recommends changing the word “trained” to “acclimatised”.

## Part 6: Husbandry Practices

### 6.1 Identification

#### Minimum Standard No. 13 – Identification

- a) All identification procedures must be applied by a competent person.
- b) Sheep and beef cattle must not be freeze branded on the head or udder.
- c) Permanent tags must be inserted according to the manufacturer's instructions.
- d) If ear marking (notching) is performed, as little as possible, and no more than 10% of ear tissue, must be removed using an implement that is clean and sharp.

B+LNZ recommends that MS 13(c) be deleted as little relevance to animal welfare can be identified.

With respect to MS 13(d) farmer opinion was varied regarding the 10% threshold for tissue removal at ear marking. While it is accepted that the removal of ear tissue is a painful procedure, there is no evidence to suggest that the amount of tissue removed has any influence on the level of pain experienced.

There is concern over how the amount of tissue removed will be evaluated. B+LNZ recommends this be carefully considered before introducing an arbitrary limit without clear guidelines as to its management.

### 6.2 Selection and Breeding

#### Minimum Standard No. 14 – Selection and Breeding

Where breeding sheep and beef cattle results in unfavourable animal welfare outcomes, these individuals must be identified and removed from the breeding flock or herd.

B+LNZ notes the removal of the following clauses relating to Selection and Breeding test below in the existing code relating to tests for animal performance, including where an animal may be dosed with or exposed to an organism or substance to assess their resistance or resilience:

### **2018 Code of Welfare**

#### **Minimum Standard 8 – Selection and Breeding Tests**

- a) Tests for animal performance which have the potential to compromise animal welfare must only be used:
  - i. where they are necessary (i.e. the outcomes cannot be derived in other, less harmful ways);
  - ii. where the tests are likely to result in information appropriate to the selection and breeding objectives; and
  - iii. where any harm is minimised.
- b) Identifying animals resistant to disease by dosing or exposing them to the disease causing organism or conditions must be carried out only in the immediate care of a veterinarian.

Given that alternatives to such testing are yet to become widely available (for example Facial Eczema tolerance or parasite resistance) B+LNZ would prefer to see the text above reinserted into the new code, in order to satisfy the requirements of MS 14 and general livestock health objectives.

With respect to the example indicator “[Ewes and cows that experience dystocia or bearings \(prolapse of the vagina\) are removed from the breeding flock or herd](#)” B+LNZ considers the wording to be too broad.

Dystocia has a complex and multifactorial pathogenesis including genetics (both dam and sire), feeding, toxicities leading to potential foetal disfigurement, abnormal foetal presentation e.g. breech, and simultaneous engagement of foetuses in the birth canal. Few of these are directly influenced by maternal genetics, and therefore removal of the dam from the breeding flock or herd does not represent a viable management strategy.

B+LNZ recommends that dystocia be deleted from this example indicator.

With respect to RBP (c): “[When selecting rams and bulls for breeding, consideration should be given to the fact that all rams and bulls can be dangerous, both to each other and to handlers and strategies to reduce the number of unwanted lambs and calves being born](#)” B+LNZ views this as confusingly worded and possibly the result of two separate sentences being merged in error.

B+LNZ would prefer to see this corrected before commenting further.

## 6.3 Mating, Semen Collection and Reproductive Technologies

### Minimum Standard No. 15 – Mating, Semen Collection and Reproductive Technologies

- a) Sheep and beef cattle must be of suitable age, size, health and condition to experience mating, pregnancy and lambing/calving.
- b) Pregnancy examinations must be undertaken by a trained and competent person in a manner that does not cause injury or unnecessary pain or distress to sheep and beef cattle.
- c) Semen collection must be carried out by a trained and competent person in a manner that does not cause injury or unnecessary pain or distress.
- d) Electroejaculation must be carried out by veterinarians or trained and competent stockpersons using effective pain relief.
- e) Equipment used for semen collection, including by electroejaculation, must be well maintained to minimise the risk of infection and injury to bulls, rams and mount animals.
- f) Where sheep and beef cattle fail to ejaculate after three repeated sequences of electrical stimulation or the animal becomes distressed or is at risk of injury the procedure must be stopped.
- g) Bulls and rams must be fit and healthy for mating and semen collection.
- h) Mount animals must be fit and healthy for use during semen collection.
- i) The size of mount animals must be appropriate for the bulls and rams used, and they must have regular rest periods during semen collection.
- j) Facilities for semen collection must provide safe footing to reduce the risk of injury.
- k) When conducting reproductive soundness testing in bulls:
  - i. mount animals must not be mounted or serviced more than twice during an exam;
  - ii. where mount animals are showing signs of distress or trauma, they must be immediately withdrawn from testing and managed appropriately; and
  - iii. the test must be carried out under veterinary supervision.

B+LNZ has sought advice from livestock breeders and veterinarians involved in the industry.

There is unanimous concern that MS 15(k)i is impractical, unrealistic, and unnecessary.

It is strongly felt that an appropriately selected mount animal, prepared for the procedure by and under the supervision of a veterinarian, is capable of withstanding more than two mounts during an examination. B+LNZ believes that the veterinarian should be able to determine if the mount animal is experiencing distress or trauma (MS 15(k)ii) and manage it appropriately.

B+LNZ recommends that MS 15(k)i be deleted.

## 6.4 Painful Husbandry Procedures

### Minimum Standard No. 16 – Painful Husbandry Procedures

- a) An appropriate method must be chosen for each painful husbandry procedure so as to:
  - i. minimise immediate pain and distress; and
  - ii. reduce post-procedure pain and health risks.
- b) Sheep and beef cattle that have undergone a painful husbandry procedure must be monitored regularly throughout the recovery period.
- c) If a painful husbandry procedure is carried out on a sheep or beef cattle less than 24 hours old, the effects of handling, pain and postoperative complications which may compromise survival through impaired maternal bonding or reduced colostrum intake must be managed.
- d) Equipment used for painful husbandry procedures must be regularly maintained, clean and fit for purpose.

B+LNZ recommends the wording of MS 16(c) be altered to “If a painful husbandry procedure is carried out on a sheep or beef animal...”.

B+LNZ is satisfied with the provision of pain relief for tail docking and castration as a Recommended Best Practice and not a Minimum Standard.

With respect to the Recommended Best Practice (RBPs) (b) and (c):

- b) Appropriate pain relief should be given when tail docking sheep, regardless of age
- c) Appropriate pain relief should be given when castrating sheep and beef cattle, regardless of age

The following is why we believe (RBPs) (b) and (c) are best to remain a RBP and would not be suited to being a Minimum Standard. B+LNZ strongly urges the consideration of on-farm and supply chain practicalities when recommending the use of pain relief for routine procedures. Pain relief medications are currently only available through veterinary authorisation, and veterinary authorisation of such medications for future use is complicated by the requirements of the ACVM Act 1997. Having consulted with the pharmaceutical industry it is unclear whether the potential demand for pain relief medications could be met by the current supply chain.

B+LNZ’s position on the routine provision of pain relief to livestock is that in order to be accepted as a requirement, the medication must be:

- Effective
- Safe
- Easy to access and administer
- Cost-effective

B+LNZ is also concerned by recent reports of fatalities in lambs following the administration of pain relief drugs at tail-docking and strongly urges further investigation into their safety and efficacy.

With respect to the sentence that appears under the General Information section of part 6.4 of the proposed Code which reads: “Tail docking of sheep should be undertaken before six weeks of age”, farmers have pointed out that this is not always possible nor practical. Lambing can occur in a mob over a period of several weeks, meaning that in any mob there will be a range of ages present. B+LNZ recommends this sentence be deleted from the Code.

## 6.6 Pre-transport Selection and Preparation

### **Minimum Standard No. 18 – Pre-transport Selection and Preparation**

- a) The person in charge must examine the selected sheep or beef cattle prior to transport to ensure they are fit, healthy, and in condition to withstand the intended journey.
- b) Ewes and cows must not be transported for sale or slaughter for seven days after giving birth unless there is a risk to their welfare.
- c) Dairy sheep must be milked out as close to transport as possible.
- d) Unweaned lambs to be transported off the farm must be fed within two hours of transport.
- e) Unweaned calves to be transported off the farm must have been fed at least half of that day's ration of colostrum or milk within two hours of transport.
- f) Water and roughage must be available at all times prior to entering the loading facility.
- g) Sheep and beef cattle must be provided with the means to mitigate thermal stress in collection areas.
- h) Dogs must not be used to load unweaned lambs or calves.

MS 18(d) and MS 18(e) appear to have been lifted directly from documentation related to non-replacement dairy (bobby) calves, for which the transportation of those animals prior to weaning is routine. As noted in the proposed Code, “Most sheep and beef cattle are farmed in extensive systems” where lambs and calves remain with their dam for several weeks or months before weaning. It is very rare for lambs or calves to be transported before the age of weaning, either with or without their dam present.

Some farmers wean lambs from their dam and transport them directly to slaughter. This is generally undertaken when the lambs are at least three months old, and by which time a significant proportion of their nutrition is derived from pasture.

B+LNZ therefore considers a requirement for lambs to have been fed within a specified time prior to transport to be irrelevant and unnecessarily prescriptive.

Similarly, calves are generally weaned at an age of approximately nine months, by which time the majority of their nutrition is derived from pasture.

B+LNZ therefore strongly recommends that MS 18(d) and MS 18(e) should be deleted.

## 6.9 Lambing and Calving

### Minimum Standard No. 21 – Lambing and Calving

- a) During regular inspection, if lambing or calving is not proceeding normally, prompt remedial action must be taken.
- b) Sheep and beef cattle (including offspring) exhibiting problems at birth are attended to promptly, and veterinary help is called if appropriate or the animal is killed humanely.
- c) Easy care lambing practices must only be undertaken with sheep which have been bred for ease of lambing and where the benefits of leaving lambing ewes alone outweighs regular and intensive supervision.
- d) Ewes and cows must be provided with a suitable environment prior to expected lambing or calving, including planning for adverse weather conditions that are likely to compromise welfare.
- e) Mechanical devices to assist in lambing or calving must only be used if necessary and by a trained and competent person.
- f) Controlled traction must only be used if the stockperson has diagnosed an unrestricted birth canal and the lamb or calf is in a suitable position for delivery.
- g) Vaginal prolapses in sheep must be cleaned and treated with an appropriate method to minimise pain and subsequent infection.
- h) Safety or bearing pins and ear tags must not be used to treat vaginal prolapses.

B+LNZ recognises that the proposed minimum standard represents a significantly more detailed standard than in the existing Code.

While feedback from some farmers shows concern that the clauses in MS 21 can be seen as unnecessarily prescriptive, many others believed it reflected standard industry practice.

## 6.10 Artificial Rearing

### Minimum Standard No. 22 – Colostrum, Hand Rearing and Weaning

- a) Artificially reared lambs and calves must receive sufficient good quality colostrum or good quality commercial colostrum substitute in a timely manner after birth.
- b) Artificially reared lambs and calves must be given colostrum, milk or milk substitute until the rumen has developed sufficiently to allow utilisation of pasture and other solids as the sole feed sources or for at least the first six weeks of life.
- c) Persons feeding newborn lambs and calves by tube must be trained and competent in the procedure.
- d) Equipment for handling, storing and feeding liquid feeds must be cleaned after use.
- e) Lambs and calves must be checked at least twice daily for signs of ill-health and provided with treatment as necessary.
- f) Lambs and calves must be provided with fresh palatable water from birth.
- g) Lambs and calves must be provided with appropriate solid feed and roughage from birth.
- h) Lambs and calves must be provided the opportunity to satisfy their need to suck.
- i) For the first three weeks after birth lambs must be fed at least three times a day.
- j) For the first three weeks after birth calves must be fed at least twice a day.
- k) Where there are signs that lambs and calves are not drinking sufficient milk, immediate remedial action must be taken.

B+LNZ recommends that the proposed Code make more explicit the difference in application of this section between orphaned beef calves and calves born to a dairy cow and bought with the intention of raising for beef, as the latter fall under the application of the Code of Welfare: Dairy Cattle.

While the intent of MS 22 is clear and well presented in the Evaluation Report, there is strong opposition among many farmers to clauses (i) and (j) for being overly prescriptive and ignoring some highly effective and common practices.

The industry-standard feeding regime promulgated by lamb-rearing expert Dr John Smart BVSc indicates that from age 12 days, twice a day feeding is appropriate to provide adequate nutrition (Smart, 2019).

Research published by Muir *et. al.* (2002) has demonstrated that calves can be transitioned to a once-a-day milk feeding regime early in life with great success in terms of the health, welfare, and growth rates of calves reared. Feedback from farmers using this system strongly opposes clause (j) as ignoring this research and the good farming practices they employ.

Based upon strong farmer feedback, expert opinion, and scientific research, B+LNZ recommends that MS 22(i) and MS 22(j) be deleted from the proposed Code and the wording of the existing standard: “Artificially reared animals must be given suitable liquid feeds until the rumen has developed sufficiently to allow it to utilise pasture and other solids as the sole feed sources” be retained.

## 6.12 Managing Fly Strike

### Minimum Standard No. 25 – Managing Fly Strike

- a) Management of sheep must include methods of prevention and treatment of fly strike.
- b) Sheep with fly strike must be identified and treated.

B+LNZ acknowledges the intent of this provision in the code. B+LNZ also recognises that the breeding of sheep that are resistant to flystrike as well as practices such as shearing and crutching are accepted by industry as methods of flystrike prevention.

## Part 7: Disease and Injury Control

### Minimum Standard No. 26 – Disease and Injury Control

- a) Stockpersons and persons in charge of sheep and beef cattle must be competent at recognising ill health, injury, or animals experiencing pain, and must take timely remedial action as appropriate.
- b) Veterinary medicines must only be used in accordance with registration conditions and manufacturer's instructions or under veterinary advice.
- c) Veterinary advice must be sought, or sheep and beef cattle killed humanely, where there is any significant injury or disease, chronic pain and/or persistent ill-thrift that does not respond to treatment.
- d) Sheep and beef cattle that are unlikely to survive, or that have debilitating congenital defects, must be humanely killed at the earliest opportunity.
- e) Persons in charge of sheep and beef cattle must ensure that their animals are under the care of a veterinarian.

B+LNZ acknowledges the intent of this provision in the code.

B+LNZ recommends, however, that MS 26(d) be reworded to: "Sheep and beef cattle that are unlikely to survive without significant intervention, or that have debilitating congenital defects, must be humanely killed at the earliest opportunity".

Farmer opinion is split regarding MS 26(e), with some farmers raising concerns including:

- A lack of clarity regarding the definition of "under the care of a veterinarian" and how it is to be applied and verified.
- Difficulties for farmers in remote areas to establish and maintain a "working relationship" with a veterinary practice.
- Some farmers consider that their experience and expertise in managing animal health and welfare is diminished by this requirement.

B+LNZ requests an explanation from NAWAC on behalf of sheep and beef cattle farmers as to how compliance with clause (e) is to be evaluated, before we provide explicit feedback on this provision.

## Conclusion

Beef + Lamb New Zealand is generally satisfied with the proposed Code, save for the recommendations contained in this submission.

Farmer feedback demonstrates a general acceptance of the minimum standards but some disagreement with the example indicators provided.

B+LNZ greatly appreciates the opportunity to continue to contribute to animal welfare policy in New Zealand and looks forward to working positively with NAWAC in the future.

Please do not hesitate to contact Beef + Lamb New Zealand for any further information or clarification on the contents of this submission.

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