



Code of Welfare for Sheep and Beef Cattle Submission
Ministry for Primary Industries
PO Box 2526
Wellington 6140

15 July 2025

By email

Submission on proposed amendments to the Code of Welfare for Sheep and Beef Cattle

The New Zealand Veterinary Association Te Pae Kīrehe (NZVA) welcomes the opportunity to comment on the proposed amendments to the Code of Welfare for Sheep and Beef Cattle. As the largest membership organisation representing veterinarians in Aotearoa New Zealand, we support members through leadership, education, guidance and support.

We are making this submission on behalf of our members. This submission represents the collective expertise and perspectives of veterinarians practising across New Zealand in both clinical and advisory roles. Our members work directly with farmers, animals, and industry bodies to deliver high standards of animal health and welfare.

The NZVA strongly supports the Code's overarching purpose of setting minimum standards and recommended best practices that protect and promote the welfare of animals under human care. As the professional body representing veterinarians, we have a unique perspective on both the science underpinning welfare standards and the practical realities of implementing these requirements on New Zealand farms. In preparing this submission, we have considered the:

- available scientific evidence underpinning each proposal
- experience of veterinarians who routinely advise, monitor, and intervene in sheep and beef production systems
- diversity of farming operations
- importance of balancing improvements in animal welfare with achievable, practical implementation.

While we broadly support measures to strengthen welfare protections, we have identified several areas of concern regarding practicality, clarity, and evidence base. Our submission outlines these concerns in detail and offers recommendations to help ensure the Code remains fit for purpose, enforceable, and aligned with best practice veterinary advice.

Recommendations

To ensure the Code delivers meaningful welfare benefits without imposing unintended burdens, we strongly recommend that the National Animal Welfare Advisory Committee (NAWAC):

- prioritises evidence-based, outcome-focused standards over prescriptive thresholds lacking clear scientific justification
- provides clear definitions and supporting rationale for each requirement to ensure consistent interpretation and compliance
- recognises the diversity of New Zealand farming systems and the need for flexible, context-appropriate solutions
- phase in any significant practice changes alongside appropriate training, resourcing, and research to enable smooth adoption.

We appreciate the opportunity to contribute to this important consultation process and remain committed to working collaboratively to ensure the Code supports meaningful, lasting improvements in animal welfare across the sheep and beef sectors.

The NZVA remains committed to working in partnership with NAWAC, MPI, farmers, and industry stakeholders to advance animal welfare in a way that is sustainable, scientifically grounded, and practical. We would welcome further consultation on any specific aspects of these proposals and are available to assist in refining guidance and implementation strategies.

Thank you for the opportunity to provide this submission.

Nāku iti noa, nā,



Kevin Bryant
Chief Executive Officer
New Zealand Veterinary Association
Te Pae Kīrehe

FEEDBACK ON PROPOSED AMENDMENTS TO THE CODE OF WELFARE FOR SHEEP AND BEEF CATTLE

Proposed Minimum Standard 2 – Animal Handling

(e) When dogs are catching sheep for treatment purposes, dogs must not cause bruising or pierce the skin.

The NZVA appreciates NAWAC's commitment to reducing injuries and distress associated with the use of dogs in handling sheep. We support the overall emphasis on effective dog control, training, and the prohibition of unnecessary activities which can lead to injuries caused by biting.

However, we have concerns with the practicality and clarity of Minimum Standard 2(e). Specifically, we are concerned that:

- The term "catching" is ambiguous and may be interpreted to include both normal mustering of sheep into pens and the direct seizing of sheep by the dogs.
- It is impossible to guarantee that a dog catching a sheep by wool will never cause bruising. Even in well-controlled situations, some bruising or minor injury is likely to occur.
- Physically catching sheep with dogs is inherently stressful and should be reserved for emergencies only.

Recommendations

1. Revise the wording of Minimum Standard 2(e) to more accurately reflect acceptable practice and welfare risk. For example:

Dogs must not be used to physically catch sheep except where no alternative method of capture is available and the sheep requires urgent treatment. In these cases, dogs must be under effective control and any injury resulting must be treated appropriately.

This change acknowledges the need to prevent avoidable injuries while recognising that the use of a dog may be necessary in rare emergency situations.

2. Include guidance that stockpersons should plan ahead to avoid situations where dogs must be used to catch individual sheep.
3. Include guidance that any dog used for this purpose must be thoroughly trained and remain under strict control.

Proposed Minimum Standard 6 – Feed

6(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.

There is broad agreement that the lower threshold for Body Condition Scoring (BCS) is appropriate, as animals in very low condition are at clear welfare risk. However, many members raised strong concerns about requiring remedial action solely based on animals exceeding the proposed maximum BCS thresholds (BCS >4 in sheep or >7 in cattle), particularly for non-pregnant animals, for several reasons:

- **Lack of clear welfare evidence:** Over-conditioned animals that are not in late pregnancy generally do not have demonstrated welfare compromise. For example, pet sheep commonly have BCS 5, and higher BCS in beef cows at some times of year is not unusual.
- **Management challenges:** Reducing BCS is difficult, especially on an individual basis, and “improved nutrition” is not relevant for lowering condition.
- **Seasonal and production variation:** BCS naturally fluctuates through the production cycle (weaning, winter, calving), and higher BCS can be part of normal management strategy to buffer feed shortages later.
- **No consistent risk timeframe:** Without specifying stage of production (e.g. late pregnancy), a universal upper threshold is not appropriate as a welfare measurement.

Recommendations

1. Revise the wording to better reflect instances when higher BCS would present an actual welfare concern. A commonly proposed alternative was:

Remedial action should be taken if BCS falls below 2/5 in sheep or 3.5/10 in cattle, or if BCS exceeds 4/5 in sheep or 7/10 in cattle only in the last trimester of pregnancy.

This approach targets known health risks (e.g. metabolic disease at calving/lambing) while avoiding unnecessary interventions for animals where a higher BCS is not necessarily detrimental to their welfare.

Proposed Minimum Standard 7- Providing for Behavioural Needs

(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.

Example indicators:

- *Sheep and beef cattle do not show signs of excessive soiling with mud and faeces (MS 7(b)).*
- *Beef cattle in winter grazing systems have at least 10m² of a suitable lying surface per animal available (MS 7(a)).*
- *In a feedlot system, beef cattle have at least 9m² of suitable lying surface per animal available, and sheep have at least 1m² per lamb and 3m² per adult sheep (MS 7(a)).*

The NZVA supports the underlying objective of ensuring sheep and beef cattle have access to clean, comfortable lying surfaces that enable them to rest in a natural position, as this is essential to good welfare. However, we have significant concerns about the evidence base, clarity, and practicality of the proposed space requirements and example indicators.

Evidence for space allowances

The proposal references example indicators with specific minimum areas but does not cite any clear empirical evidence that these thresholds are optimal or necessary in New Zealand production systems.

Dairy cattle are proposed to have at least 10 m² of space per animal, and calving cows and bulls have double that allowance. While the NZVA appreciates NAWAC's detailed summary of the literature regarding lying space for dairy cattle (as provided in the most recent Dairy Cattle report), NAWAC's own statement acknowledges that "there is currently insufficient scientific evidence to support a minimum requirement of 10m² for outdoor intensive winter grazing systems as a regulation."

Members identified difficulties assessing and enforcing this regulation in an outdoor setting, along with practical considerations of managing the proposed space requirement on different forage crops. Further discussion with industry highlighted that MS 7(d) (which required 10m² in winter grazing systems) was too specific and would be better suited as recommended best practice.

Despite this, the unsubstantiated 10m² figure remains as an Example Indicator, even though several referenced studies within NAWAC's own report concluded that lying time is not impacted by stocking density. Specifically:

- no relationship between stocking density and lying behaviour was found in some commercial on-farm research (Lombard et al., 2010; Charlton et al., 2014, as cited by Schütz et al., 2015)
- stocking density did not affect daily lying proportion, energy metabolites during the dry period, or milk yield during subsequent lactation (Fujiwara et al., 2019).

By retaining the 10m² figure as an Example Indicator, it effectively becomes guidance for assessing compliance with the minimum standard, despite NAWAC's own conclusion that this figure is neither substantiated nor shown to improve welfare outcomes or facilitate enforcement and appears excessive relative to current practice and international standards.

Inconsistency in beef cattle space thresholds

It is unclear why the minimum space per animal differs between winter grazing systems (10 m²) and feedlots (9m²) when both aim to allow cattle to lie comfortably.

Clarification is needed as to whether this difference reflects environmental factors (e.g. weather protection), stocking densities, or assumptions about time spent lying.

Vagueness of critical terms

Terms such as "excessive soiling" are subjective and open to wide interpretation. In practice, a small proportion of animals will sometimes lie in manure despite clean alternatives.

We recommend NAWAC define "excessive" with clear guidance, for example, specifying a proportion of the herd affected or a description of when soiling constitutes a welfare risk.

Recognition of variability

While we agree that lying behaviour is a critical welfare indicator, lying space and surface preferences are influenced by multiple factors, including breed, production system, physiological state, and season.

A rigid minimum may not always reflect welfare outcomes and could disadvantage systems already achieving good welfare through different approaches.

Recommendations

1. Remove measurements that:
 - are not supported by evidence of improved welfare outcomes
 - have no alignment with international standards
 - are not practically measurable or enforceable.
2. Include clear references or an evidence summary underpinning any proposed minimum space allowances.
3. Clarify why different thresholds apply to different systems (feedlots vs winter grazing).
4. Define subjective terms such as “excessive soiling”.
5. Consider rephrasing the Minimum Standard to be outcome-focused, specifying that lying surfaces and space must be sufficient to allow animals to:
 - lie down comfortably in a natural position
 - rise without difficulty
 - maintain acceptable levels of cleanliness and hygiene
 - avoid injury or distress.

Example wording:

Sheep and beef cattle must be provided with sufficient space and a suitable lying surface to enable them to lie down in a natural position, rise without difficulty, and remain clean and dry. Minimum space allowances should be informed by current evidence and must be sufficient to meet these outcomes.

Proposed Minimum Standard 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:

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.

The NZVA supports the objective of ensuring housed animals are provided with good air quality, as this is essential to maintaining animal health, welfare, and productivity. However, we wish to highlight several considerations regarding the proposed change.

Reliability of detection by smell

The ability of humans to detect and quantify ammonia levels by odour alone is inconsistent and

unreliable. Relying on subjective odour detection creates significant variability in compliance assessment and enforcement.

For example, individuals regularly working in housed facilities often become desensitised to ammonia odours over time, reducing their ability to perceive problematic concentrations. Conversely, people unfamiliar with these environments may perceive ammonia odour at concentrations that are below thresholds of physiological concern. To ensure consistent compliance with this Minimum Standard, the most accurate and effective approach would be to require the use of an ammonia meter to monitor air quality. This aligns with the Recommended Best Practice:

(h) An ammonia meter should be used to measure air quality in indoor off-paddock facilities, allowing remedial action as required to ensure good air quality.

Given that the Code is designed to be outcome-focused, and that air quality directly affects both welfare and productivity, we consider that objective measurement is necessary to demonstrate compliance in a defensible and transparent manner.

Consistency across species

We note that NAWAC has proposed reducing the acceptable level from 25 ppm to 15 ppm, referencing consistency with draft Codes for pigs, dairy cattle, and deer. While harmonisation across species can support clarity and enforcement, it should be underpinned by evidence demonstrating that:

- a 15 ppm threshold materially improves welfare outcomes compared to 25 ppm
- this threshold is achievable across a variety of housing systems without unintended consequences (e.g. excessive ventilation creating cold stress).

Clarity of compliance expectations

While 10–15 ppm of ammonia in air can sometimes be detected by smell, levels above 25 ppm are more likely to cause observable irritation in humans. In practice, using human comfort as a proxy for animal welfare may not be reliable. Therefore, any enforcement of the Minimum Standard should be based on measurable parameters rather than subjective assessment alone.

Recommendations

To strengthen the clarity and practicality of MS 11 a(ii), we recommend the following amendments:

1. Amend the Minimum Standard to state that ammonia concentrations must be measured using an appropriate instrument (e.g. ammonia meter), rather than relying solely on human perception.
2. Provide clear references demonstrating that the 15 ppm threshold is evidence-based, improves welfare outcomes, and is feasible to maintain in diverse housing systems for sheep and beef cattle.
3. Consider reframing the Minimum Standard to specify the intended welfare outcome (maintaining air quality at a level that does not compromise respiratory health, comfort, or performance), and then require that objective measurement be used to verify this outcome.

Proposed Minimum Standard 15 – Mating, Semen Collection and Reproductive Technologies

(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.*

The NZVA supports the objective of safeguarding the welfare of mount animals used during bull reproductive soundness evaluations. However, we have significant concerns about the proposed requirement that mount animals must not be mounted or serviced more than twice during an examination. This restriction does not align with established best practice guidelines and would effectively eliminate the use of Mating Ability Testing (MAT) as a diagnostic tool in many commercial settings.

MAT remains an essential component of Bull Soundness Evaluation, as it is the primary method for detecting penile deformities, musculoskeletal abnormalities, and inadequate libido. Survey data from New Zealand has demonstrated that 20–22% of bulls are unsound for breeding, and more than half of these cases are identified through MAT. Eliminating or severely restricting MAT would compromise the identification of unsound bulls, leading to lower conception rates, inferior calving patterns, and significant economic losses for producers.

The proposed limit of two mounts per exam lacks a clear scientific rationale and is not supported by evidence demonstrating improved welfare outcomes over current professional standards. Moreover, the wording is ambiguous, as it does not specify whether “exam” refers to each bull tested, each day of testing, or the entire testing period. This ambiguity risks inconsistent interpretation and application.

By contrast, NZVA guidelines provide clear, evidence-based recommendations to ensure mount animal welfare while preserving the diagnostic value of MAT. These guidelines specify that veterinarians who conduct significant numbers of MAT examinations typically use multiple crates and mount animals to distribute workload. Specifically:

- for one to 10 bulls, one crate and one mount animal are used and replaced if needed
- for six to 20 bulls, two crates and two mount animals are used
- for more than 15 bulls, three crates and three mount animals are used, with all animals replaced if more than 20 bulls are assessed.

Under this framework, the number of intromissions per mount animal is generally limited to 10 or fewer, with any mount animal showing signs of distress, trauma, or fatigue immediately withdrawn and replaced.

Animal welfare is closely monitored during MAT procedures. Veterinarians routinely:

- apply sedation and use epidural anaesthesia to reduce stress
- use obstetrical lubricant to minimise trauma
- maintain detailed records of mounts and welfare observations.

These practices ensure that mount animals are handled humanely and removed immediately if there is any indication of distress or injury. A rigid two-mount limit would not improve welfare beyond these safeguards and would instead undermine effective, professionally supervised evaluations.

Recommendations

1. Replace the proposed restriction with an approach that aligns with established guidelines and professional judgement. Specifically:
 - mount animals should be limited to a maximum of 10 mounts per session, with the option to extend this to 15 mounts only if the animal remains calm, free of injury, and shows no signs of fatigue, as determined by the supervising veterinarian
 - sufficient crates and mount animals should be provided to allow rotation and rest periods, consistent with the scale of testing being conducted.
2. Clarify the definitions of “exam,” “effective pain relief” (particularly in the context of electroejaculation), and “trained and competent persons” to ensure consistent interpretation and compliance.

This approach preserves the welfare of mount animals while maintaining the capacity to detect breeding unsoundness, supporting both animal wellbeing and herd reproductive performance. We encourage NAWAC to consider aligning the Minimum Standard with these evidence-based practices and to work with the veterinary profession on developing further refinements or alternative methods where appropriate.

Proposed Minimum Standard No. 16 – Painful Husbandry Procedures

The NZVA recognises and supports NAWAC’s commitment to improving welfare outcomes for animals undergoing painful husbandry procedures, including tail docking and castration. We agree that there is clear and substantial scientific evidence demonstrating that both procedures cause significant acute and post-procedural pain in lambs and calves, irrespective of age. We further acknowledge that pain mitigation aligns with international trends, increasing consumer expectations, and New Zealand’s reputation as a producer of high-welfare animal products.

However, we believe any regulatory changes must be carefully designed to balance welfare benefits with the realities of implementation in New Zealand’s pastoral farming systems.

Evidence clearly shows that local anaesthetic injections (such as lignocaine) provide effective acute pain relief during castration procedures and, when administered properly, significantly reduce cortisol responses and pain behaviours. Non-steroidal anti-inflammatories (NSAIDs) such as meloxicam offer additional benefits in reducing inflammatory pain post-procedure but have limited utility in alleviating acute procedural pain.

Therefore, the use of combination protocols (local anaesthetic to address intra-procedural pain and NSAIDs to address post-procedural discomfort) is recognised as the most effective approach. However, even under ideal conditions, no current strategy fully eliminates pain.

Pain relief for tail docking

There are several barriers to consistently achieving safe and effective pain relief for tail docking, including:

- the unique anatomical complexity of the tail
- the skill requirement to administer local anaesthetic ring blocks or epidurals safely
- hygiene risks in extensive systems.

While options such as Numnuts® devices have demonstrated promising results for ring castration and potentially tail docking, their uptake requires training, investment, and further research to optimise protocols for the New Zealand context. Similarly, topical anaesthetics are limited in effectiveness, particularly when used with rubber ring methods, and are not a complete solution.

Importantly, the provision of pain relief also introduces logistical and regulatory considerations, such as:

- ensuring consistent veterinary oversight
- the competency of operators to safely administer restricted veterinary medicines
- the availability and affordability of supply chains for anaesthetics and NSAIDs.

Without adequate lead-in time, training, and resourcing, blanket regulation requiring pain relief for all animals could create unintended consequences. These could include increased non-compliance, procedural delays during high-volume operations, and welfare impacts from rushed or improperly administered analgesia.

We therefore support NAWAC's proposal to include the provision of pain relief for tail docking and castration as Recommended Best Practice in the Code of Welfare, rather than immediate regulation.

This approach allows time for further engagement with veterinarians, producers, industry organisations, and supply chain stakeholders to collaboratively identify workable pathways to phase in broader pain mitigation. We agree with NAWAC's view that this process should include robust impact assessments, clear guidelines on what constitutes effective pain relief in different contexts, and mechanisms for training and certifying operators in safe administration practices.

Castration

The NZVA endorses the position that effective and appropriate analgesia should be provided wherever practical. Local anaesthetic injection into the scrotal neck prior to application of the rubber ring remains the preferred method for acute pain relief and can be implemented relatively consistently when farmers are properly trained and authorised. We recommend the development of a streamlined authorisation and training system to ensure that veterinarians can efficiently support farm businesses seeking to adopt this practice.

Finally, we acknowledge that market forces are already driving change in some sectors, as evidenced by the NZ Merino Responsible Wool Standards, which will require pain relief for all tail docking and castration by 2025. NZVA supports working with industry partners to share lessons learned from these initiatives and ensure alignment where possible.

Recommendations

1. Keep the use of pain relief for castration and tail docking as Recommended Best Practice while broader consultation and planning takes place.
2. Support future regulatory proposals with clear, evidence-based guidance specifying:
 - which analgesic protocols are considered effective for each procedure and method

- practical steps to ensure operator competence and safe administration
 - realistic timeframes and resources for implementation.
3. Invest in research to develop and validate new pain mitigation strategies for tail docking that are effective, safe and practical.
 4. Work closely with veterinary organisations to develop scalable training, authorisation, and support systems to enable adoption.

Proposed Minimum Standard 18 – Pre-Transport Selection and Preparation

(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.

(h) Dogs must not be used to load unweaned lambs or calves.

The NZVA acknowledges the importance of protecting the welfare of unweaned animals during transport. However, we have concerns about the practicality, clarity, and evidence base for some aspects of the proposed requirements.

Terminology and definitions

The term “unweaned” is vague and would benefit from clearer definition, ideally using age-based or physiological criteria. For example, many unweaned lambs or calves kept with their dams are significantly older, heavier, and more robust than artificially reared, early-weaned dairy animals. This creates ambiguity in both enforcement and compliance, as the welfare risks for these groups differ considerably.

Establishing clear age thresholds, weight parameters, or developmental indicators would improve clarity and consistency, ensuring that regulatory requirements align with the actual welfare status of the animals rather than relying on an imprecise label.

Minimum age for transport to saleyards

Current practice allows calves as young as four days old to be transported to saleyards. From extensive veterinary and farmer experience, this practice is consistently associated with high disease risk, poor welfare outcomes, and high mortality. Calves of this age are particularly vulnerable due to immature immune systems, uncertain colostrum status, and the cumulative stress of prolonged transport, mixing, and unfamiliar environments.

We strongly support the Recommended Best Practice to raise the minimum age for calves going to saleyards to at least seven days old, and ideally 10 days, to improve survival and welfare. Where calves are transferred directly from one farm to another for rearing (farmer-to-farmer transfer), a lower minimum age (e.g. four to six days) may be appropriate because it reduces mixing, time in transit, and exposure to multiple disease sources. Farmer-to-farmer transfer of calves reduces risk markedly for the calves. Personal contact between dairy farmer and rearer enables better calf management (especially colostrum management) on dairy farms through positive feedback loops.

Use of dogs during muster

In many pastoral systems, dogs are essential for the safe, efficient, and low-stress movement of animals, including ewes with lambs or cows with calves. Banning dogs could cause unnecessary delays, increased stress from prolonged yarding, and safety risks for handlers.

Recommendations

1. Clarify that Minimum Standard 18(e) is intended primarily for unaccompanied unweaned lambs and calves, rather than mixed mobs with dams at foot.
2. Establish clear age thresholds, weight parameters, or developmental indicators for the term “unweaned”.
3. Raise the minimum age for calves going to saleyards to at least seven days old (ideally 10 days) to improve survival and welfare.

Proposed Changes on Minimum Standard 21 - Lambing and Calving

(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.

The NZVA broadly supports efforts to improve the welfare of ewes experiencing prolapse. However, we have several concerns regarding the practicality, clarity, and proportionality of the proposed requirements and prohibitions.

Banning ear tags and bearing pins without clear alternatives

The prohibition of ear tags and bearing pins without specifying practical, effective alternatives is problematic. Suture placement requires skill, time, and equipment, which are not always available on extensive properties. If these methods are to be prohibited, recommended alternatives should be specified and their accessibility ensured.

Pain relief requirements

Veterinarians agree that pain relief is important and desirable, especially where treatment involves piercing the skin (e.g. sutures or commercial retainers). However, it is not practical to expect that all farmers will or should routinely carry local anaesthetics or be trained to administer them correctly.

While NSAIDs are more accessible on-farm, their onset and effectiveness differ from local anaesthesia. Requiring local anaesthetic for all cases risks delaying treatment and potentially worsening animal welfare outcomes, especially if the technique used to administer local is unhygienic or inappropriately administered.

We recommend that pain relief be strongly encouraged, with a minimum requirement only in cases involving significant tissue trauma (such as sutures). Clear guidance on when and how to use NSAIDs as an interim measure should also be included.

Veterinary oversight and competency requirements

Veterinarians support that uterine and rectal prolapses should only be treated by veterinary professionals due to their complexity and the higher welfare risks. For vaginal prolapses, where non-veterinarians are permitted to undertake treatment, there must be clear expectations of competency, including hygiene, appropriate restraint, and proper technique. Training resources and veterinary support should be readily available to those undertaking this work.

Easy care lambing guidelines

While breeding and selecting sheep for ease of lambing is strongly supported, consideration must be given to the realities of extensive management systems. We recommend that the guidelines explicitly acknowledge the need for flexibility in extensive environments and focus on the preparedness of the flock and the overall management system rather than prescribing rigid timeframes for intervention.

Recommendations

1. Amend the Minimum Standard so that pain relief is strongly encouraged, but only mandated when treatment involves significant tissue trauma.
2. Provide clear guidance on when and how to use NSAIDs as an interim measure.
3. Identify clear, practical, and accessible alternatives for prohibited methods such as ear tags and bearing pins.
4. Recognise the diversity of farming systems, especially extensive operations. Acknowledge the need for flexibility in extensive environments, focusing on flock preparedness and the overall management system.
5. Outline clear expectations of competency for non-veterinary treatment of vaginal prolapse, including hygiene, appropriate restraint, and proper technique.

Proposed Changes on Minimum Standard 22 - Colostrum, Hand Rearing and Weaning

(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.

The NZVA appreciates the intent of the proposed changes to promote optimal nutrition and welfare in young lambs and calves. We strongly support measures that encourage good colostrum management, appropriate husbandry, and adequate nutrition.

We acknowledge that this standard is informed by research that demonstrates that:

- restricted milk feeding (e.g. 20% body weight/day) is associated with higher pre-weaning growth compared to more limited feeding
- overfeeding or infrequent large feeds increases the risk of abomasal bloat.

We also note that the *Ministry for Primary Industries Practical Guide to Rearing Lambs* (MPI, 2024), developed with input from dairy sheep stakeholders, NZVA, and Beef + Lamb NZ, supports at least three feeds daily up to three weeks of age. However, it is important to recognise that this guide was primarily targeted to lifestyle and non-commercial lamb rearing operations, which often differ from large-scale commercial sheep farms in both resourcing and management systems.

We understand the rationale for frequent smaller feeds, especially to reduce bloat risk. However, we are not aware of any robust, peer-reviewed studies showing that extending three-times-daily feeding to three weeks of age consistently results in superior health, survivability, or welfare. In most commercial operations, it is established practice to feed three times daily during the first 7–14 days, transitioning to twice daily thereafter as lambs begin to consume solid feed.

We support ensuring that calves receive appropriate levels of feed to meet their growth, health, and behavioural needs. However, there are recognised gaps in the current research regarding the optimal amount, quality, and frequency of feeding required to meet the specific needs of calves, particularly in the context of New Zealand's farming systems.

Recommendations

1. Conduct further research into New Zealand cattle breeds and farming practices to better understand the impact of various feeding regimes on the growth, health, and behavioural needs of calves to ensure recommendations provide the intended positive production and welfare outcomes.
2. Amend Minimum Standard 22(i) to:

Lambs should be fed at least three times daily for the first two weeks after birth, unless receiving ad libitum milk or are being fed on the dam. After this period, feeding may be reduced to twice daily provided lambs are healthy, vigorous, and beginning to consume solid feed.