

Hon Andrew Hoggard
Associate Minister of Agriculture
Parliament Buildings
Wellington

28 October 2025

By email

Tēnā koe Minister Hoggard,

The New Zealand Veterinary Association Te Pae Kīrehe (NZVA) represents more than 4,000 veterinarians, allied veterinary professionals, and veterinary students across Aotearoa New Zealand.

We are writing to express serious concerns regarding the consultation process, communication, and procedural handling of the Animal Welfare (Regulations for Management of Pigs) Amendment Bill currently before Select Committee.

Between April and July 2022, the Ministry for Primary Industries (MPI) and the National Animal Welfare Advisory Committee (NAWAC) undertook a joint consultation on a draft Code of Welfare for Pigs and associated regulations, following the earlier High Court case. We understood that process marked the beginning of continued engagement with affected stakeholders to ensure compliant standards were developed within the High Court's timeframe.

Concerns

1. **Lack of ongoing engagement and departure from NAWAC's consultation standards**

Public consultation closed in 2022, followed by a stakeholder Zoom meeting in January 2023. Since then, there has been no further engagement with the NZVA, despite repeated requests for updates and clarification.

The Regulatory Impact Statement (July 2025) refers to "targeted consultation with pig farmers, veterinary organisations, research institutions and animal-welfare advocates," yet the NZVA received no correspondence or invitation to participate after 2023.

Despite this, during the Bill's introduction you stated that the NZVA supported the proposed changes, specifically referencing the farrowing-crate and mating-stall provisions. The NZVA was not consulted on the Bill or its contents and was unaware of its introduction until after media coverage. This created a misleading impression of NZVA endorsement where none had been sought or confirmed.

2. **Departure from the High Court timeline and MPI recommendations**

The 2020 High Court ruled that existing minimum standards breached the Animal Welfare Act and directed the Minister to consider the regulations to phase out farrowing crates. NAWAC completed the economic analysis of the three proposed codes in May 2023 and submitted a final draft Code to the Minister, with a further submission in 2024.

No explanation has been provided for delays in implementing the proposed Code, contributing to the current timeline crisis and the impending legislative lapse.

The December 2025 deadline, set by Parliament to allow time for resolution, has left farmers without clarity for five years, preventing them from planning demolition or reconstruction of their facilities.

3. Introduction of legislation without notification

The NZVA received no direct notification of the Bill's introduction and became aware of it only through media coverage. This lack of notice prevented the NZVA from preparing for or contributing meaningfully to the Parliamentary process, despite their established involvement in the earlier Code development.

4. Inadequate submission period and delayed release of key documents

The Government allocated a 14-day public submission period for a bill of substantial scope and technical complexity. The NZVA received no advance notice, formal announcement, or invitation to make a submission, deviating from previous practice, despite the statements about our ongoing involvement.

The lack of communication, combined with the compressed timeframe, prevented meaningful review and undermined the transparency of the consultation process.

5. Breach of good-faith consultation and transparency standards

The lack of ongoing communication since 2023, the introduction of legislation without notice, and the late publication of key documents collectively represent a failure in procedural process and transparency.

These shortcomings have limited the NZVA's ability to contribute constructively to policy development and have undermined confidence in the integrity of the consultation process.

The veterinary profession supports progressive, science-based improvements in animal welfare. However, the lack of transparent communication and the decision to extend implementation well beyond both MPI's recommendation and the High Court's timeline risk prolonging welfare deficits with no clear justification.

The NZVA urges the Government to pause and review the legislative process to restore transparency, ensure alignment with scientific advice, and uphold the intent and obligations of the Animal Welfare Act 1999.

Nāku iti noa, nā,



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