



NZVA
New Zealand Veterinary Association
Te Pae Kīrehe

Committee Secretariat
Governance and Administration Committee
Parliament Buildings
Wellington

3 October 2023

To the Governance and Administration Committee,

Submission on the Emergency Management Bill (Bill No. 225-1)

The New Zealand Veterinary Association Te Pae Kīrehe (NZVA) is the only membership organisation representing veterinarians in New Zealand. We support members through leadership, education, advocacy, recommended best practice and wellbeing support.

We are making this submission on behalf of NZVA members. We have been actively engaged with members in areas affected by emergencies and extreme weather events in 2023, and have kept members informed about our submission and the proposed Emergency Management Bill.

Yours sincerely,

Kevin Bryant
Chief Executive Officer
New Zealand Veterinary Association

Executive summary

A key driver behind this submission is the Civil Defence Emergency Management (CDEM) response to Cyclone Gabrielle earlier this year. During this response, animal welfare concerns were largely ignored, which resulted in confusion, lack of direction among support agencies, and negative impacts on animal welfare and veterinary wellbeing.

We believe we need to do better for animals and the people who care for them.

Recommendations:

There is ambiguity in the Civil Defence Emergency Management Act 2002 about what actions people or organisations can take to ensure the welfare of animals in an emergency.

We recommend the following changes are made to the Emergency Management Bill:

1. Clause 102 (Entry on premises) is amended to include animals, and to clarify that entry onto premises is allowed to rescue animals (as it is to rescue humans)
2. Clause 102 (Entry on premises) is amended to include the word 'property', so farms are covered by the clause
3. Clause 107 (Power to carry out inspections and other activities in relation to property and things) is amended to clarify that animals are covered, and that the power to carry out inspections and other activities may be exercised to 'seize' animals for their safety/rescue
4. animals are recognised as property in the Emergency Management Bill, as they are in the Crimes Act.

In addition, we recommend the following changes be made in the wider policy setting space:

1. A shift from the current human-centric approach to emergency management to a systems integrated approach. This approach should recognise the interdependencies of people, animals and the environment, enabling the implementation of the Coordinated Incident Management System (CIMS) 3rd edition principles prioritising animal welfare. This would mean that CDEM would be obligated to include animals in emergency response and recovery processes, and that animals would be included in NEMA national and regional plans.
2. The Government officially recognises veterinary services as an essential service during emergencies, as it does with disease incursion plans such as COVID-19 and the Foot and Mouth Disease (FMD) Response and Recovery Plan.
3. Veterinary services are funded as part of the emergency response funding through CDEM. The NZVA recommends an AWEM Reimbursement Fund is established to enable AWEM support agencies to effectively deliver essential animal welfare services during emergencies and aid in the recovery process.

Background

The Ministry for Primary Industries (MPI), the NZVA and other support agencies have designated roles and responsibilities under the National Civil Defence Emergency Management (CDEM) Plan 2015 and accompanying guide. The Animal Welfare sub-function includes, but is not limited to, the provision of animal rescue, shelter, food, water, husbandry, veterinary care and other essentials for all animals.



The NZVA is a member of the MPI National Animal Welfare Emergency Management (AWEM) Subfunction Group, a sub-group of the National Welfare Co-ordination Group. As a support agency, we are assigned roles and responsibilities as outlined in the National CDEM Plan 2015. At both the national and regional levels, the NZVA may be required to provide the following services, as set out by the National Emergency Management Agency (NEMA):

- i to provide advice on where veterinary treatment can be obtained;
- ii to provide assistance in alleviating animal suffering through the co-ordination of the provision of advice on feeding, relocation, or sheltering of animals during and after an emergency; and
- iii to co-ordinate the provision of trained veterinary personnel to assist in affected areas; and
- iv to ensure rapid communication of relevant information to veterinary members and branches, especially to and from affected areas

The NZVA will be seeking changes to the above wording to clarify our role in an emergency. These changes will include:

- adding “current and continual advice” to the first point, since any advice in an emergency situation will be dynamic and evolving
- amending the phrase “alleviating animal suffering” to “ensuring animal welfare” to avoid ambiguity about the term ‘suffering’
- changing the language to reflect that we would ensure rapid communication of information to the entire veterinary profession, not just NZVA members.

The NZVA plays a crucial role in emergency management. It is essential to acknowledge the diverse range of stakeholders and their various connections with the NZVA. These stakeholders include NZVA staff and members, the veterinary profession, MPI and other AWEM sub-function organisations.

Emergency management context

The experiences of NZVA members during Cyclone Gabrielle highlighted several issues caused by ambiguity that hindered Civil Defence personnel’s ability to interpret the legislation as they saw fit. We have outlined the key issues our members experienced below.

Animal welfare

There is a sense among veterinary professionals that animals are not seen as a priority during emergency responses, and that animal welfare is treated as separate from human welfare – rather than intertwined.

In the early stages of the Cyclone Gabrielle response, for example, CDEM did not accept animal feed and supplies from veterinary clinics as critical supplies for isolated communities.

This included CDEM refusing requests from veterinarians to deliver dry cow therapy to dairy farmers. Dry cow therapy is an important tool to help prevent mastitis when cows stop being milked. Under normal circumstances, farmers prepare cows to stop milking, which allows their bodies to transition and minimises risks to their welfare. During Cyclone Gabrielle, many farmers were abruptly unable to milk their cows due to power outages and road closures (which prevented milk from being

transported). As a result, farmers were forced to dry off their herds immediately and earlier in the season than normal. This meant there were higher risks of poor welfare outcomes due to the lack of transitioning and higher volumes of milk being produced at that time of year. Without adequate veterinary supplies to mitigate these risks, farmers were unable to manage the welfare needs of their cows until veterinary clinics organised private helicopters to deliver supplies to them.

Additionally, several veterinary clinics reported being contacted by clients who asked them to send human supplies (including baby formula, nappies, food and fuel) with veterinary supplies, as they had not heard from CDEM.

Veterinary services

During the COVID-19 pandemic response, veterinary services were identified as an essential service – both for the health and welfare of animals, and safeguarding public health and food security. However, there were significant gaps in integrating veterinary services as an essential or critical service during the response to Cyclone Gabrielle.

For example, veterinary practices were refused access to emergency fuel supplies for clinic generators and vehicles.

Veterinary professionals were also denied access through cordons and road blocks, preventing them from attending to animal welfare needs on farms. These decisions did not consider the effects of multiple events on animal health procedures that had been previously postponed due to other events in the region. This resulted in animal welfare, biosecurity and food security risks, as well as long-term economic and human welfare impacts for animal guardians unable to provide care for their animals.

The CIMS 3rd edition is New Zealand's official response framework for emergencies. It recognises the importance of people, animals and the environment by including them in their core principles:

Any response should mitigate and manage the consequences of an incident on the affected individuals, families/whānau and communities, including animals. Response personnel must recognise an individual's rights, treat individuals with fairness and dignity and ensure the needs of affected people and animals are identified and met throughout the response and into recovery.

Although this is a positive step, such principles do not resolve the current disconnection experienced by AWEM practitioners and veterinary services. Humans, animals and the environment are intricately linked, but the way we respond to scenarios that impact them are largely independent. For example, many non-animal agencies fail to recognise their role in the human-animal-environment interface.

Resourcing and funding

Successful policy implementation and emergency response requires sufficient and appropriate resources, including financial, human, technology, supplies and equipment. Access to resources has been a key issue for the veterinary profession during the response and recovery phases of Cyclone Gabrielle.

The New Zealand CDEM funding framework does not include costs associated with AWEM response and recovery. Organisations with appointed AWEM roles and responsibilities are required to retain funding and resources to maintain their capacity and capability outlined in the legislation.

Human welfare arrangements are delivered by central and local government agencies in a business-as-usual capacity. However, organisations delivering animal welfare services during an emergency are generally working in non-routine operating parameters.

These organisations rely primarily on volunteer, private business and non-government organisations during an emergency, with the exception of local authorities. These arrangements, based on goodwill, limit the availability of resources and create a significant risk to the organisations' ability to operate after the event.

Furthermore, the increased frequency and severity of emergencies in New Zealand has the potential to cause burnout in responders and communities, further depleting already limited resources.

Veterinary businesses assume a financial burden when addressing animal health requirements and providing animal welfare services during an emergency. They have emphasised they cannot afford to bear the financial risk associated with delivering animal welfare services and addressing human wellbeing needs in isolated communities (which is what they did during Cyclone Gabrielle) if they cannot seek reimbursement for costs incurred.

In the Foot and Mouth Disease (FMD) Response and Recovery Plan, there is provision for veterinary services to be funded to deliver services in the event of an FMD outbreak. As such, a precedent for veterinary services to be funded during an emergency exists. The NZVA contends that there is little difference in providing veterinary services during a natural disaster emergency, compared to a disease incursion emergency.

Animal welfare context

The Animal Welfare Act 1999 recognises animals as sentient beings, meaning they can experience emotions that are meaningful to them, not unlike humans.

New Zealand was the first country in the world to capture this in legislation, a fact that we as a country have proudly promoted internationally. Being seen as a country that upholds the highest standards of animal sentience has certainly aided our reputation and trade activities overseas.

It seems logical that our emergency management legislation should follow and support this leadership position.

Animal sentience

In August 2015, the Animal Welfare Act was revised “to reform the law relating to the welfare of animals and the prevention of their ill-treatment”. In particular, the Act was revised:

(i) to recognise that animals are sentient:

(ia) to require owners of animals, and persons in charge of animals, to attend properly to the welfare of those animals: ...



The National Animal Welfare Advisory Committee (NAWAV) explains sentience as:

The National Animal Welfare Advisory Committee (NAWAC) understands animal sentience to mean that animals have emotions, feelings, perceptions, and experiences that matter to them. These can be negative (such as pain or boredom) as well as positive (such as pleasure or comfort). We don't know whether animals' emotions, feelings, and experiences are similar to those of humans. We also don't know if they are felt with the same intensity. But they matter to individual animals and have an impact on their welfare.

The NZVA's definition of sentience, which encourages prioritisation of positive states and welfare enhancement, is consistent with scientific knowledge and current public expectations of 'good practice'.

It also aligns with the stated objectives of the NZVA 2030 strategy, which recognise that the wellbeing of animals, humans and the environment are inseparable. This acknowledgement establishes a responsibility for those in charge of animals to treat them in a way that prevents unnecessary pain or distress, and to provide opportunities for them to experience positive emotions.

Relationship between humans and animals

The separation of human and animal welfare in the Emergency Management Bill is a major concern. Many veterinary professionals argue that a failure to understand interdependency between human and animal welfare creates unintended divisions and results in ineffective emergency responses.

During the COVID-19 pandemic, it became evident that there is a direct correlation between humans and animals, and that animals play an important role in human wellbeing. The human-animal bond is a mutually beneficial and dynamic relationship that is influenced by behaviours essential to health and wellbeing. This includes emotional, psychological and physical interactions between people, animals and the environment. A veterinarian's role in the human-animal bond is to maximise the potential of this relationship between people and animals.

There is a lot of literature supporting the importance and relevance of the human-animal bond, including an article by Robin Chadwin DVM, MPVM titled *Evacuation of Pets During Disasters: A Public Health Intervention to Increase Resilience*. In this article, Chadwin states:

Pet owners may be stranded at home, unwilling to leave their pets behind. Others refuse evacuation orders or attempt to re-enter evacuation sites illegally to rescue their animals. Psychopathologies such as grief, depression, and posttraumatic stress disorder are associated with pet abandonment during an evacuation. Health care workers may refuse to work if their animals are in danger, leaving medical facilities understaffed during crises. Zoonotic disease risk increases when pets are abandoned or left to roam, where they are more likely to encounter infected wildlife or unowned animals than they would if they were safely sheltered with their owners.

The Human Animal Bond Research Institute (HABRI) is internationally recognised for its support of scientific research into the human-animal bond. They have found that:

Positive human-animal interactions appear to be related to changes in physiological variables in both humans and animals, such as reduced heart rate and blood pressure. Research has

demonstrated an association between pet ownership and enhanced social support, emotional well-being and general well-being. Pet ownership has also been found to play a role in helping people manage long-term mental health conditions.

Similarly, a report on the animal welfare impact of the September 2010 earthquake in Christchurch states:

It is clear from the Canterbury earthquake that the integration of animal welfare organisations and veterinary professionals with wider civil defence emergency management will be essential for managing future disasters.... As new guidelines are published by NAWEM, further uptake of animal emergency planning is likely to occur and this will see an increased demand for contributions by veterinary professionals to local civil defence emergency management. The uptake of companion animal emergency management by CDEM Groups would be strengthened if statutory mandate gave effect to the new NAWEM guidelines. Whatever the future New Zealand disaster; pet owners, farmers, veterinarians, animal welfare officers and emergency managers need to collaborate to create resilient communities, with the understanding that animals too, are part of these communities.

It is disappointing to see how little progress has been made in this space since 2010. During Cyclone Gabrielle and the North Island flooding events earlier this year, we heard stories of people refusing to evacuate homes without their pets, farmers sneaking past cordons to tend to their animals, and horse owners putting themselves in danger to save their horses. An article published in the June/July issue of VetScript provides some graphic examples of these points.

Impact on biosecurity

The Emergency Management Bill needs to ensure that veterinary services are available to help manage biosecurity risk as well as animal welfare issues.

During the Cyclone Gabrielle response, CDEM prevented veterinarians supporting their clients on several occasions. Veterinarians reported not being able to deliver critical supplies such as dry cow therapy, teat sealant and flystrike prevention products to isolated farms.

There was also a lack of understanding about the risk of zoonotic diseases, such as leptospirosis, spreading among humans and animals following floods. Animals who have been separated from or abandoned by their guardians during a flood increase the risk to human health, as they are more likely to come into contact with contaminated water, spoiled food, rodents or animal carcasses. This increases the chance of zoonotic diseases such as leptospirosis or salmonella spreading in the community.

References

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3. **Glasse, S and Wilson, T.** *Animal welfare impact following the 4 September 2010 Canterbury (Darfield) earthquake.* 2011
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