



# Submission to NAWAC on the draft Deer Code of Welfare 2022

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## Introduction

The New Zealand Deer Farmers Association (NZDFA) thanks the National Animal Welfare Advisory Committee (NAWAC) for the opportunity to submit its views on the draft Deer Code of Welfare 2022. The NZDFA was formed in 1975, to represent the interests of deer farmers and provides a vital link to the rest of the deer industry and the public. The association represents the voices of over 1000 passionate and committed deer farmers and hopes that NAWAC will accept these comments in good faith and act on them accordingly.

Overall, the NZDFA supports the current draft of the code and believes that if it is released with the amendments suggested here, then it will be a valuable resource for ensuring good deer welfare, now and into the future.

For information, if a minimum standard is not mentioned in the following submission, this means that the NZDFA agrees with it as presented.

## Commentary

### *Minimum Standard 6 – Mixing of Deer*

The NZDFA is concerned by the blanket requirement to provide 'sufficient environmental complexity', to allow deer to escape aggression (std 6b). Deer are highly mobile animals and, in our view, providing adequate space to avoid aggression is a far more crucial factor than environmental complexity, which is poorly defined and hard to measure. In addition, the NZDFA is aware that there are some parts of the country, where deer are farmed on flat land and in these cases, it will be extremely difficult to comply with the proposed standard as worded.

- The NZDFA therefore requests that NAWAC remove the requirement for 'sufficient environmental complexity' to allow farmers to focus on providing ample space for deer when they are mixed, which is what is already done.

The NZDFA is also concerned by the proposed requirement to introduce a persistently bullied animal to a new mob (std 6d). In our view, this would have the opposite intent to that intended, i.e. the introduced animal would be subject to further bullying, as it would be an unfamiliar individual and its place in the new mob would have to be re-established from scratch.

- Rather than make this a minimum standard, the NZDFA would suggest that it becomes a recommended best practice.

This would enable it to be used as an option, noting that in most cases, a persistently bullied animal would be culled rather than moved to a new mob, as this would result in less overall suffering.

#### ***Minimum Standard 7 – Feed***

- The NZDFA would strongly advise that NAWAC sets the body condition score for remedial action to 'below 2', rather than '2 or below' (std 7c).

Although this may seem like a matter of semantics, we are concerned by the ever-increasing amount of scope creep in government regulations and the impact this will have on our members. While the majority of deer farmers will take remedial action well before a deer reaches condition score 2, the difficulties in accurately assessing body condition without manual palpation are noted in the evaluation report and we fear that otherwise law-abiding farmers may be unfairly penalised on the basis of differences in personal opinion over whether or not an animal is above, at or below condition score 2.

Minimum standard 7h, requires automated feeding systems to be monitored daily. At this point in time, this type of system is not common in the industry and is only used as a supplementary option, i.e. it is not the only source of food for the deer.

- The NZDFA would like to see this moved into a recommended best practice or for an example indicator to be included in the Code, providing clarification that monitoring can include automated alarm systems, e.g. text alerts, when something goes wrong.

#### ***Minimum Standard 8 – Water***

- The same outcome as above is requested for minimum standard 8e (automated water systems).

In addition, the NZDFA is concerned by the proposed regulation for water access during winter grazing. While we support the intent of the regulation, it is important to note that winter grazing in deer is conducted differently to other livestock, in that deer are not normally back fenced. This means that they are free to move around the paddock, to and from the available water sources. In addition, stock exclusion requirements and other restrictions on the placement of water systems, may make this difficult for some deer farmers to comply with.

- We therefore request that a flexible approach to the provision of water for animals being winter grazed is taken during the development of the regulations and that the NZDFA is given the opportunity to comment further on them before they are finalised.

#### ***Minimum Standard 10 – Farm Facilities, Equipment and Technologies***

- The NZDFA suggests that in the final version of the Code, the evacuation requirement in minimum standard 10a(iv) should explicitly apply to deer, to avoid any ambiguity.

### **Minimum Standard 11 – Managing Deer in Off-Paddock Facilities**

- The NZDFA strongly advises NAWAC go back to the wording of the 2018 Code for the standard on lighting (std 11d), as it would accommodate variation in natural light, which may, on occasion, drop below the proposed 50 lux minimum.

For information, most modern wintering facilities for deer are either open sided or of the ‘poly tunnel’ design. This means they rely solely on natural light for illumination, which their designs maximise. Under the proposed minimum standard, these systems would have to be fitted with artificial lighting, just to cater for the rare occasion when ambient daytime light levels dropped below 50 lux, which would be both costly and impractical.

In addition, older, barn style systems already comply with the artificial lighting requirement of the 2018 Code, so it is hard to see what benefit the proposed change would offer in these instances.

Finally, we are also concerned by the 15-ppm ammonia requirement (std 11f). While deer are unlikely to breach this, due to the well-ventilated nature of the housing systems used and fact that deer produce minimal amounts of liquid effluent compared to cattle, we see this as the thin end of the wedge in regulatory terms.

- We propose a compromise to 20-ppm ammonia, from the current 25-ppm, which we feel is both achievable and fair.

### **Minimum Standard 12 – Identification**

Although ear marking (std 12b) is not widely practiced in the deer industry anymore, a number of our members have expressed the view that it is a valuable tool for discouraging poachers. The NZDFA believes that deer farmers should have access to as many options as possible to help them mitigate the terrible impacts (physical, emotional and financial) of poaching and is strongly of the view that ear marking should be permitted.

- Therefore, we suggest that the standard is either moved into a recommended best practice, or else clarified to allow its limited use where poaching is an issue.

### **Minimum Standard 14 – Mating, Semen Collection and Reproductive Technologies**

Electroejaculation is the only method that works for artificially collecting semen in deer and that the number of animals that receive the treatment is exceedingly small in comparison to the total number of farmed stags.

- The NZDFA proposes that the maximum number of electroejaculation sequences per session is increased to two, until such time that the welfare impacts of the procedure are better understood.

### **Minimum Standard 17 – Fawning**

Minimum Standard 17b requires a fawn to be in the normal position for delivery *before* manual assistance can be given. However, in the vast majority of cases, the hand needs to be inserted in order to determine if the fawn is in the correct position.

- The NZDFA is concerned that the standard would not allow this initial assessment to take place and would suggest that it is either moved to a recommended best practice, or reworded to clarify that ‘diagnosis’ includes normal physical examination.

### ***Minimum Standard 17 – Weaning***

In our view, the requirement to wean fawns at not less than twelve weeks of age (std 17a) is impractical, both from the perspective of ensuring maternal welfare and because of its potential impact on pre-rut weaning, which is a relatively widespread practice in some parts of the country. Where late fawning occurs, which due to natural mating, is beyond the farmer's control, pre-rut weaning would be impossible within the timeframe specified by the standard. As a compromise, the NZDFA would like to see the minimum standard reduced to eight weeks, with twelve weeks adopted as a recommended best practice.

### ***Minimum Standard 22 – Pre-transport selection and Management***

The NZDFA has serious concerns over the proposed minimum standard.

First of all, preventing hinds and fawns weaned for less than ten days from being transported (std 22f), will have a major impact on the industry. The DeerQA transport programme allows transport of deer at weaning, from farm to farm only, with a maximum total duration (from the start of yarding until unloading) of six hours.

- The NZDFA would strongly urge NAWAC to adopt this standard instead of what is proposed.

The DeerQA Transport programme does prohibit the transport of unweaned deer or those that have been weaned for less than ten days to auction or saleyards.

- The NZDFA supports this position and recommends that the current proposed minimum standard 22 (f) is revised accordingly. The NZDFA would also support moving the current proposed minimum standard 22(f) into a recommended best practice, as an alternative option.

Second, the NZDFA opposes minimum standard 22 (g), on the grounds that it would effectively stop the transport of high-value stud animals and make the transport of small numbers of deer to slaughter impractical for many farmers.

- Given the practical considerations and increasing financial pressure on many deer farmers, until the scale of the problem (if any) and its underlying causes are known, the NZDFA is of the opinion that this standard should be removed.

Finally, the NZDFA is concerned that the requirement for water to be available at all times before transport (std 22i) means that every pen must have a water supply. If this is the case, then the standard will be unworkable, as the design of deer pens simply does not allow for water to be provided in every single pen. In practice, deer do have access to water in the deer yard (as distinct from the pen), which is where they are held until being moved into pens just prior to loading.

- To resolve this concern and avoid significant angst for deer farmers, we request that NAWAC clarifies this standard and recognises the distinction between holding deer in the yard and in pens.

### ***Minimum Standard 24 – Disease and Injury Control***

The NZDFA has received considerable opposition from its members around the requirement for there to be an animal health plan that is regularly reviewed and signed off by a veterinarian (std 24h). While we are not fundamentally opposed to the concept of an animal health plan, compared to many other species, deer simply do not suffer from the range of health issues that affect other

livestock species. This means that, in our view, the standard places an additional and unnecessary financial burden on farmers.

- We would therefore suggest that the standard becomes a recommended best practice, with a requirement for it to be reviewed by an *animal health advisor*, to give farmers more flexibility about how they choose to manage the health of their deer.

## **Concluding remarks**

Once again, the NZDFA would like to thank NAWAC for the opportunity to make a submission on the draft Deer Code of Welfare 2022. While some of our recommendations may challenge what NAWAC is proposing, we believe that they offer the most equitable outcomes for our members and the deer that they care for on a day-to-day basis.

As already noted, apart from the above issues, we are comfortable with the rest of the Code as drafted and look forward to seeing the final version, with our suggestions incorporated, in the near future.

Please contact me if there is anything you wish to discuss further or if the NZDFA can offer a practical perspective on your deliberations.

*Justin Stevens, 4 November 2022*