

## The Proposed New Zealand Code of Practice for Velvet Harvesting: Implications for the Veterinarian

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*NOTE: This paper is a discussion document only and must not be taken as established policy or the views or beliefs of the profession or the authors.*

### 1. Introduction

In 1989 the Minister of Agriculture established a committee known as the Animal Welfare Advisory Committee (AWAC) with the following terms of reference:

**Broadly:** To advise the Minister of Agriculture of all matters relating to the Welfare of Animals other than those matters which fall within the jurisdiction of the National Animal Ethics Advisory Committee.

**Specifically:**

- 1 To review the Animal Protection Act and advise the Minister on any changes required.
- 2 To develop codes of minimum standards for the welfare of particular classes of animals and review existing codes.
3. To recommend specific areas where research into animal welfare matters is required.

The Committee is made up of representatives of the veterinary profession, animal rights organisations, animal welfare organisations, Federated Farmers, the National Animal Ethics Advisory Committee and MAF, along with an independent philosopher, and has a veterinarian as the independent chairperson (Blackmore, 1990).

The question of velvet antler removal from stags came under the scrutiny of AWAC early in its existence. It was recognised that there was a need for a code of minimum standards for the welfare of stags during velvet harvesting. To this end the chairman of AWAC convened a sub-committee, comprising representatives of the New Zealand Veterinary Association, Deer Branch New Zealand Veterinary Association, Save Animals from Exploitation (SAFE), SPCA, MAF, Deer Farmers Association and Game Industry Board. This group set out to draft a document entitled "Code of Conduct for the Welfare of Deer During the Removal of Antlers". It is anticipated the code will be in place for the 1991 velvet harvesting season.

This paper was written in the anticipation that the sections of the discussion paper on the revision of animal welfare legislation relating to velvet harvest and codes of conduct will be incorporated into the new act i.e. codes will be given legal status.

## 2. The Need for a Code

The moral, legal and ethical implications of velvet harvesting have been discussed in detail by Wilson (1989) and endorsed by Blackmore (1990) Briefly, the need for a code is based on the following observations:

- current animal protection legislation is confusing in its reference to horns rather than antlers,
- there is room for confusion in relation to the definitions of pain, suffering and mutilation as referred to in the current Animals Protection Act;
- present animal welfare legislation referring to dehorning only includes animals of 20 months or older;
- there is growing animal welfare awareness and concern worldwide and animal welfare and animal rights activity and public awareness in New Zealand is increasing;
- there have been precedents in international markets where animal welfare issues have restricted international trade of animal products;
- there has been considerable concern expressed by the veterinary profession over stags being velvetted without analgesic;
- the establishment of a code of practice is consistent with the terms of reference of AWAC,
- velvet harvesting has been banned or is prohibited in a number of countries;
- in order to protect the velvet harvesting industry, it is generally agreed that there is a need to be pro-active in determining standards rather than risking overwhelming opposition which could mount over a period of time

## 3 Legal Status of the Code of Conduct

The discussion document on the proposed Animal Welfare Act which will replace the current Animals Protection Act 1960 suggests that codes of conduct will be given full legal status under the terms of the Act. In Britain, similar codes are given legal status. The implications of this are considerable, as for the first time, anybody performing velvet harvesting legally must perform to a standard which is laid down and which fulfils all obligations concerning the welfare of the stag.

## 4. Content of the Code

### 4 1 Acceptance of Velvet Harvesting

While it is not stated, the establishment of the code implies that velvet harvesting is to be legally recognised in New Zealand as a justifiable farming practice. There is a statement in the code that "Generally antlers need to be removed from farmed deer at some stage". There is an acceptance that animals in hard antler, including spikers, can inflict injury to other animals and humans. While there have been reported a number of reasons for not removing antler while in velvet from farmed stags (Wilson, 1989), there is an equally long list of reasons in favour of removal at the velvet stage. The AWAC sub-committee firstly agreed that it is necessary to remove antlers from stags for them to be farmed safely and effectively. The second conclusion was that antlers are probably best removed when in velvet, again because of safety to other animals, themselves and to humans. At that time, circulating testosterone levels are low and stags are least aggressive. A third justification for velvet harvesting presented in the code is that sale of velvet antlers is a significant source of income for New Zealand. The latter is a statement accepting the reality that

economics play an integral part of a range of procedures performed on animals in this country.

Thus, the philosophical debate about the ethics of farming stags for velvet has been concluded in New Zealand in favour of velvet harvesting, at least in the meantime. This places the New Zealand attitude in contradiction to that of a number of other countries (Wilson, 1989) and despite New Zealand being one of the world's largest producers of velvet, along with USSR, China, Korea, Australia, Canada, USA, and some European countries, it is possible that this issue may need to be addressed again at some future date in response to international trends in animal welfare.

#### 4.2 Definitions

The code clearly defines antlers as:

**"appendages which grow annually from the pedicle formation of the frontal bone of deer".**

Velvet antler is also well defined.

**"growing antler which contains an abundant blood and nerve supply and which has a fully intact skin with a covering of fine soft hair".**

The opinion is given that surgical removal of velvet antler without some form of anaesthesia is likely to cause pain and distress to the animal.

Hard antler is defined as:

**"the antler when growth has ceased, calcification has occurred and the skin nerve and blood supply no longer function. This is recognisable when the animal has begun to rub dried and cracked skin from the antler."**

The opinion is given that hard antler can be removed above the pedicle without causing pain.

There is acknowledgement within the code that it is possible to prevent antler growth by surgical procedures. It is stipulated in the code that **"this operation must be carried out under anaesthesia by a veterinarian"**. Paradoxically, this procedure is specifically excluded from the code of conduct which is only concerned with the annual removal of antlers. There is a belief by some that this aspect of antler growth control should be included in the code, since all the currently used techniques are of welfare concern.

#### 4.3 Stags of All Ages

Definitions within the code of conduct stipulate that stags of all ages come under the jurisdiction of the code. This removes the confusion that exists in the present Animals Protection Act which refers to dehorning of animals only 20 months of age or older which appears to be in contradiction to the clause relating to infliction of unnecessary pain or suffering upon an animal (Wilson, 1989).

One implication for the veterinary profession is the sheer number of stags from which velvet is to be removed. At present veterinarians are involved generally only with the removal of stags from rising 2 years of age or older. In excess of 50% of the total stag population is less than 1 year of age. Questions have

been raised as to whether the veterinary profession has the manpower to undertake all velvet harvesting. The second implication is the question relating to costs, since probably the majority of 1-year-old stags will be slaughtered. The code indicates that transport of deer in velvet which may be damaged is not permitted. Thus, all stags going to slaughter at or less than 12 months of age will require their velvet antlers to be removed.

Currently it is economic for spiker velvet to be harvested for sale. Most spiker velvet is removed without analgesic or veterinary involvement. It has been questioned whether spiker velvet harvest would be economic if only veterinarians were permitted to perform velvet harvesting or even if analgesics were required. The code of conduct may accelerate a shift of emphasis away from spiker velvet harvesting. The deer farmer may look at removal of spikes after they harden or adopt alternatives of preventing antler growth so that 12-month-old stags do not have velvet. This may be achieved by castration, polling or inhibition by immunological means (e.g. anti GnRH vaccination). If some of these practices were adopted by farmers they may need to be incorporated into an Animal Welfare Code.

#### 4.4 Veterinary Supervision

For the veterinary profession there is little doubt that the most significant clause in the code is that **"the removal of antlers in velvet must be under veterinary supervision"**.

The importance of this provision is that for the first time a procedure undertaken widespread on deer farms in New Zealand will only be permitted under veterinary supervision i.e. it will be illegal for farmers to harvest velvet without veterinary supervision. This presents the veterinary profession with a considerable responsibility. In effect the profession is being given legal recognition as the guardian of the welfare of velvet stags. Farmer representatives, animal welfare and animal rights groups have accepted that the veterinarian is the person best qualified to act in this capacity.

The term "veterinary supervision" is not defined in the proposed code. The term "under veterinary supervision" is well known to the veterinary profession in New Zealand, since it applies to the use and prescription of a range of drugs used on animals. However, no clear definition of that term has been presented to the profession and consequently there is a considerable range of individual interpretations. It is the belief of the authors that when it comes to animal welfare issues there should be little room for interpretation and therefore the need for a clear definition within the code is obvious.

To be effective, veterinary supervision must be acceptable to the veterinary profession, animal welfare and rights concerns, and the farming industry. It provides the profession with an opportunity to demonstrate that, in our opinion, welfare issues are not open to compromise.

This clause will create many problems for deer farmers since presently a considerable number of stags are velvettted without veterinary supervision. Some stags are velvettted without analgesic, while others are velvettted using analgesics or chemical immobilising agents obtained from sources other than a veterinarian or from veterinary sources which do not function properly in a

supervisory capacity on that deer farm. Furthermore, some farmers obtain local anaesthetics from pharmacists and these are used for velvet harvesting. The deer industry will have to initiate a campaign to inform deer farmers of the need for veterinary supervision and the possible ramifications to the industry as a whole if the requirements of the code are not upheld.

An obvious question related to veterinary supervision is how can it be proven that stags were velvetted under veterinary supervision. This is an issue which has not yet been addressed, but the time may be fast approaching when velvet harvested or presented for sale must be accompanied by a veterinary certificate. This would give an assurance that velvet removed from a stag on that property has indeed been removed in accordance with the need for veterinary supervision. At the moment such a procedure would be voluntary, but it may be the only method of allowing the veterinary supervision clause of the code to be policed. From the farmer's point of view there may be a positive side to veterinary certification of velvet and that is in the area of hygiene. If proper standards were implemented this could enhance the quality image of New Zealand's velvet product.

#### 4.5 "Veterinary Approved, Trained & Competent Individuals"

The code allows that "supervision can be direct or indirect. In the latter case veterinary approved, trained and competent individuals will be allowed to remove antlers in velvet." The code then goes on to state "the removal of velvet without veterinary supervision is likely to be considered a contravention of the Animals Protection Act 1960". The authors believe that laypeople being allowed to remove antlers in velvet must not be regarded by all as a automatic right, but a right which must be earned, the same as the veterinary profession does currently.

From the veterinary profession's point of view, endorsement of laypeople performing velvetting would be the most controversial clause within the code of conduct. There is a substantial proportion (78% of 110 responders) of veterinarians who responded to a recent survey (Welch, 1990) who believe that velvet harvesting should be performed only by a veterinarian. Reasons given in that survey were animal welfare and drug usage issues. Conversely, 17% of veterinarians believe that a reliable client could be instructed how to velvet humanely and responsibly. Of these, some felt that, ideally, a veterinarian should be present, but in practice it was not possible given geographical isolation and vast numbers of deer as reasons. Five percent of respondents replied that they were unsure about who should or should not be permitted to perform velvet harvesting.

Given that velvet antler removal will be under veterinary supervision, it is logical that the training and approval of competence of individuals wishing to perform velvet harvesting also be under the veterinarians supervision. Thus the major practical implications for veterinarians are in the areas of training, assessment of competence, and supervision. These areas are not currently in the proposed code. The authors believe that for the code to be workable and legally enforceable, more detailed guidelines need to be incorporated into the code.

#### 4 5 1            **Training and Assessment**

There are three options.

- Centralised training schools.
- Individual client/vet on-farm instruction.
- Combination of both.

It is the view of the authors that approved people should possess a basic knowledge of animal welfare issues, antler and associated structure growth physiology and anatomy, pharmacology of chemical immobilisation agents and/or local anaesthetics, principles of surgery and an appreciation of pain and stress physiology. A standardised training procedure will be necessary to ensure consistency, and therefore for the attainment of theoretical knowledge, training "schools" would be appropriate. Assessment would be by written examination.

However, it would not be possible to provide adequate practical training in a "school" format. Given that physical application of the techniques is a major component of velvet harvesting a substantial number of stags would be necessary for training each individual, and personal tuition and supervision would be needed. This would be physically impossible in a group teaching situation. The authors' opinion is that a minimum of 20 stags should be velvettted by the prospective lay velvetter in order to develop technical competence.

Training of individual farmers by their private veterinarian would be the second option. Veterinarians could be provided with the necessary training modules and indeed, for the theoretical component, could conduct farmer seminars or training courses from which individuals would submit themselves for examination as for the "schools" proposal above. The major advantage of the one-to-one veterinary/farmer training is in the area of practical application of techniques.

The major disadvantage of individual veterinarian/farmer training sessions is in terms of assessment. In order to satisfy animal welfare requirements, at the same time as allowing the veterinarian to maintain a normal farmer/client relationship, assessment of practical competence may need to be undertaken by an independent observer. It could place great strain on the relationship between the farmer and the veterinarian, if that veterinarian had to refuse permission for the client to velvet harvest because of lack of competence. The veterinarian could be accused of self interest and the client/vet relationship would be destroyed.

It would appear that the most logical procedure may be to conduct training schools or seminars from which farmers would submit themselves to theoretical examination. Once having proven an acceptable level of theoretical knowledge they would then become trained in the practical procedures by their own veterinarian and then submit themselves to assessment of their practical skills. This would usually require a visitation to the farm. At the same time the suitability of the farmer's handling facility would be assessed.

One issue not directly addressed by the code is that many laypeople may wish to velvet stags other than their own. In this instance the overriding factor will

be the requirement for veterinary supervision and for the requirement that animal remedies used under veterinary supervision are used in accordance with animal remedies legislation i.e. the animals concerned must truly be under the supervision of the prescribing veterinarian

A further issue is that of veterinary practice technicians who may be trained to perform velvet harvesting and undertake this procedure on farms which are bona fide clients of that veterinary practice. This suggestion may be consistent with veterinary employment patterns in the future, as a technician may be trained to perform a number of para-veterinary procedures. The profession will need to address this issue in the future.

#### 4 5.2            **Cost**

Training, assessment and supervision will cost money. Instruction courses will require professional instruction. Written training modules prepared for this purpose will be produced only at a cost. It will cost farmers time and money to attend training sessions and the assessments will need to be done by professional people.

On-farm training by the veterinarian will need to be charged at normal veterinary rates. Assessment of practical competence will require a payment for travel and fee expenses.

On-going supervision by the veterinarian will need to be at a cost to the farmer

It is the belief of the authors that farmers in general will not have considered the cost of the privilege of being permitted to perform velvet harvesting. We believe individual farmers will need to assess the economics of training, assessment and supervision versus the cost of having the veterinarian present to perform the velvet harvesting operation. It is probable that only those farmers with large numbers of stags to velvet will find it economical to undergo training, assessment and supervision. The authors believe that some farmers may be unhappy with this reality, but the veterinary profession must not be prepared to allow compromises in animal welfare for purely economic motives

#### 4 5.3            **Policing**

The subject of policing of the requirement for veterinary supervision, training etc has not been addressed by either the code or the proposed new Animal Welfare Act. The authors suggest that the simplest way of ensuring that the provisions of the code are met may be to insist on veterinary certification to accompany velvet at the point of removal or sale.

#### 5                **Post-Operative Care**

The code indicates that animals velvettted "**should be kept under careful scrutiny for at least 4 hours after the operation**" and that "**animals should be kept under observation in accordance with good stockmanship for several days after the operation**".

The implications here are that the veterinarian must ensure that the farmer understands how to recognise when something is wrong with the animal in the

event of untoward reactions or post-surgical complications, and to advise of the procedures to follow.

6 **Hard Antlers**

The code states that for removal of hard antler "the use of sedatives is considered advisable". The concern of the veterinary profession in this instance is the proper use of the drugs concerned, and the welfare of the deer being handled

7 **Transport**

The code states that "no deer with antlers in velvet at a stage of growth which could be damaged easily ..... should be transported or confined where there is risk of injury to their velvet or other animals". The most likely reason for transporting stags at the time of the year when velvet is growing would be to send them to slaughter. Veterinarians as inspectors at deer slaughter premises will have an obligation to ensure that this requirement of the code is upheld

8 **Drugs**

Nothing within the code of conduct overrides animal remedies legislation. Both local analgesics and chemical immobilising agents which will be used for velvet harvesting may be used only on animals under veterinary supervision as described elsewhere (Wilson, 1989). A recent survey (Welch, 1990) showed that 16% of responding veterinarians supply Xylazine to deer farmers. The code itself will not alter the right of the veterinarian to prescribe drugs. On the other hand the code will require the veterinarian to undertake supervision as discussed above.

There is potential for conflict between farmers and veterinarians relating to the supply of the drugs. Many veterinarians indicate that they are unwilling to prescribe sedative or chemical immobilising drugs because of the risk to both the animal and humans. Farmers who have been trained and assessed as competent may demand of the veterinarian that such drugs be prescribed as a matter of right. Conversely, many veterinarians indicate that they are not unhappy with the concept of prescribing local anaesthesia to trained and competent individuals. The individual practitioner will have to determine his or her own policy on this issue.

A further important consideration is the availability of local anaesthetics from pharmacists. However, recent indications are that the practice of pharmacists dispensing local anaesthetic for animal use is not legal. If the local is for use on animals it becomes an animal remedy and can therefore only be dispensed under prescription. Veterinarians may need to ensure the pharmacy profession is aware of this and also understands the veterinary supervision requirements of the code in relation to velvet harvesting.

9 **Deer Handling Facilities**

With many veterinarians unwilling to prescribe chemical immobilising agents and with the possibility that those agents will be classified by the Animal Remedies Board as unavailable to farmers, there should be a marked



improvement in deer handling facilities on farms where owners wish to velvet their own stags. The authors believe this would be a positive step, but again the farmer will have to accept the cost associated with upgrading facilities and weigh these against the cost of having a veterinarian perform the procedure.

## 10 Conclusions

While some members of the veterinary profession may find it difficult to accept the concept that laypeople be permitted to perform velvet harvesting, there are several positive aspects of this code for the veterinary profession. At the time of writing the tasks ahead are to reach agreement on a suitable definition of veterinary supervision and to devise a training and assessment programme for those laypeople wishing to have the privilege of performing velvet harvesting.

The real test of the veterinary profession will be to implement the veterinary supervision requirements of the code, bearing in mind that welfare of the animal is the issue, and to ensure that utmost professional standards are maintained.

On a global basis this code may well provide a precedent for velvet harvesting procedures in other countries. Conversely, acceptance of velvet harvesting and laypeople velvet harvesters may bring conflict from animal welfare and rights concerns in other countries which may interfere with trade. The code will not automatically immunise the New Zealand deer industry against external influences. However, it should go a considerable distance toward satisfying animal welfare concerns both within New Zealand and internationally.

## References

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