

CODE OF WELFARE: TEMPORARY HOUSING OF COMPANION ANIMALS

CODE REPORT 1 OCTOBER 2018

Introduction

1. The draft Code of Welfare: Temporary Housing of Companion Animals has been developed by the National Animal Welfare Advisory Committee (NAWAC), pursuant to the Animal Welfare Act 1999 (the Act). This report accompanies the Code recommended by NAWAC to the Minister, as required by section 74 of the Act.

The report notes:

- the reasons for NAWAC's recommendations;
- the nature of any significant differences of opinion about the Code, or any provision of it, that have been shown by the submissions;
- the nature of any significant differences of opinion about the Code, or any provision of it, that have occurred within NAWAC; and
- if applicable, those matters contained in, or related to, the Code that the Committee considers should be dealt with by regulations under the Act.

In providing this report, NAWAC notes that it fully considered all submissions it received and reviewed relevant scientific literature, and that there was discussion among NAWAC members on many points. This report is not required to, and does not attempt to, show every detail of the analysis and discussions that took place.

2. There are a number of minimum standards where it is clear that they are the minimum necessary to ensure the purposes of the Act will be met and require no further explanation for their inclusion. NAWAC has decided that it will not provide comment on these minimum standards or recommended best practices, but will provide explanations on minimum standards which it believes are complex or controversial or on which it received submissions with significant differences of opinion. Minimum standards as drafted may have been amended for a number of reasons, including to make them legally robust, to ensure a more effective coverage of the issue, or to change from a recommended best practice to a minimum standard (or vice versa).
3. It should be noted that the Act does not define "significant differences". While there were a variety of opinions expressed in the submissions, NAWAC did not consider that all differences necessarily represented significant differences of opinion. NAWAC has taken the view that significant differences are either where there are large numbers of submissions which are contrary to a minimum standard in the Code, or where a submission puts forward a justification based on scientific evidence or good practice for a different or alternative minimum standard. NAWAC notes that some individuals or organisations may interpret "significant differences" in a way that varies from the NAWAC view. There were no significant differences of opinion about the Code, or any of its provisions, among NAWAC members.

4. The Code applies to all persons responsible for the welfare of companion animals in a temporary housing facility, including animals in boarding establishments, animal welfare centres and pounds, quarantine/isolation facilities and pet shops.

Why do we need a code of welfare for temporary housing of companion animals?

5. Many establishments temporarily house companion animals within New Zealand. A temporary housing facility may be owned and managed by a public or private organisation, or by an individual person, a welfare organisation, a government department or a local authority. It may be commercial, non-profit or a charitable organisation and include (but is not limited to): boarding establishments, pet shops, animal welfare centres, shelters and pounds, quarantine/isolation facilities, grooming establishments, animal wholesale facilities and daycare centres. While boarding establishments attached to veterinary clinics are covered by this code, veterinary clinics housing animals that are undergoing veterinary treatment or supervision are not covered. Note that (stationary) temporary housing facilities used or operated by animal transport companies are included under this code, but the actual transport of the animals is covered in a separate code of welfare.

Daycare centres are a recent development where owners can bring their animals (particularly dogs) to the centre for the day to help prevent the animals experiencing boredom at home while their owners are at work. The Companion Animal Survey (2011) states that there are 59 pet minding and 72 pet boarding and transportation companies listed in the National Yellow Pages, ranging from daycare facilities to animal holiday/resort-style facilities for longer stays. According to the survey 30% of all dog owners and 18% of all cat owners used these services in the year prior to the survey being taken.

6. The Act specifies that owners and persons in charge of animals must meet the needs of animals in their care. It does not specify how to meet these needs. Nor does it describe how those responsible for ensuring compliance with the Act might determine whether or not these needs have been met. Additionally, the Act functions to avoid unnecessary or unreasonable pain or distress being caused to animals, but does not list the areas or practices in which this might be a concern and the ways in which it might be avoided. This is the function of this Code of Welfare.
7. It is essential that owners and persons in charge know what the needs of companion animals in temporary housing facilities are, and how these needs can be met, in order that they can act lawfully and so that the welfare needs of the animals are met. This Code expands on the basic obligations of the Act (i.e. provides more detail) by setting minimum standards and recommending best practice for the care and management of animals in temporary housing facilities. It is expected that those required to ensure compliance with the Act will use it to assist in identifying unacceptable practices.
8. The Act requires that all reasonable steps are taken to ensure that the physical, health, and behavioural needs of animals are met. In this Code these needs are described in the areas of competency and animal handling, food and feeding, assessment on admittance, general

health, contagious diseases, providing for behavioural needs, housing design and construction, facility management, quarantine/isolation management, contingency planning for emergencies, sale and rehoming, euthanasia and quality assurance.

Code preparation and public submissions

9. The Act allows for any individual or organisation to draft a code of welfare. The Code was initially drafted by a working group established by the New Zealand Companion Animal Council, including representatives from the Society for the Prevention of Cruelty to Animals (SPCA), the New Zealand Veterinary Association, the Companion Animal Society, the New Zealand Kennel Club (NZKC), New Zealand Cat Fancy, the Ministry of Agriculture and Forestry (MAF; now Ministry for Primary Industries), the Pet Industry Association, AsureQuality and representatives of tertiary education providers (Unitec and Mahurangi Technical Institute), boarding establishments and pet shops. Representatives of those likely to be affected by the Code were consulted during its preparation and before public notification. The draft code has been reviewed by representatives of animal welfare organisations, cat colony management groups, boarding establishments, local authorities and veterinarians.
10. NAWAC considered the Code in early 2014 to ensure that it complied with the purposes of the Act, that it was written clearly so as to be readily understood, and that representatives of those likely to be affected by it had been consulted. At that time, as with all codes of welfare, NAWAC did not make any final decisions on the Code until it had received submissions. The Code is required to be publicly consulted, and for NAWAC to come to any conclusion prior to this consultation would have meant that NAWAC was not following due process by acting in a biased and predetermined manner.
11. The Code was publicly notified on 25 June 2014 by notices in the major newspapers in Auckland, Wellington, Christchurch and Dunedin. In addition, it was sent to all major libraries and to specific interest groups. The closing date for submissions was 7 August 2014.
12. A total of 28 submissions from individuals and organisations, and 15 identical email submissions were received during the public consultation period. All submissions were read in their entirety and carefully considered by a subcommittee appointed by NAWAC to develop the Code. A summary of the submissions was prepared and NAWAC's responses to the submissions were noted.
13. In addition, responses to nine specific questions were sought during public consultation and are summarised here:
 - *Do you consider a code of welfare for the temporary housing of companion animals to be necessary?* The majority of responses were affirmative. However, it was suggested by some submitters that the minimum standards set out in the Code could be written as regulations that are directly enforceable in order for them to serve the purpose they were drafted for and to ensure strict compliance.
 - *Do you agree that the minimum standards in this code are the minimum necessary to ensure that the physical, health, and behavioural needs of companion animals in temporary housing facilities will be met?* Responses were generally affirmative. However, concern was raised that

there was a risk that many current facilities would not comply due to various constraints including financial position, impossibility to alter existing structures, low financial reward for compliance and local government and Resource Management Act rules and requirements.

- *Do you agree that the example indicators given are appropriate to describe how to measure or assess the achievement of the intended outcome of the minimum standards?* While generally affirmative, it was suggested that extra information be provided to reduce areas left open to interpretation.
- *Do you agree that the recommendations for best practice in this Code are appropriate?* While generally affirmative, it was suggested that some of the recommendations of best practice be incorporated into minimum standards and there was also concern that implementing recommended best practice would result in having to employ extra staff.
- *Do you think this Code would change existing arrangements for the management of companion animals in temporary housing facilities?* There is concern by some that the Code would result in a shift away from traditional facilities with possible impacts on animal welfare. More home-based boarding facilities may spring up. In addition, it was raised that without being directly enforceable the Code would probably not change existing arrangements or have a real and recognisable impact on the welfare of animals housed temporarily.
- *Will complying with this Code involve costs for you or your business?* All responses were affirmative. Costs mentioned included new equipment for weighing animals, computer and software upgrades, additional staff costs, facility upgrades and additional costs for facility management such as heating charges.
- *What barriers do you see to the implementation of the proposed Code and how might they be resolved?* Some respondents did not see any barriers to the implementation of the Code. Some respondents however mentioned extra costs and reduced time available with animal clients due to extra paperwork as potential barriers. Difficulties with enforcing the Code were also seen as a significant barrier to implementation of the Code.
- *What benefits do you see from having this Code?* Benefits identified included improved animal welfare of companion animals in temporary housing facilities, greater clarity for owners and persons in charge in relation to their obligations under the Act, greater guidance in day-to-day operations of organisations, promotion of high standards of health and hygiene and the provision of a framework for effective auditing of establishments for compliance with the Act.
- *What other impacts would this Code have on New Zealand society, the economy, or the environment?* Positive impacts identified included that the Code gives greater effect to the Act and ensures that animals in temporary housing facilities are provided with species-specific minimum standards of welfare. It was suggested that ‘with the information contained within the Code, owners, consumers and the organisations themselves can advocate, demand and strive for best practice’, which could have several positive flow-on effects (e.g. animals that received adequate physical and psychological care passed on to or back to contented owners which could lead to decreased veterinary and hospital fees, decreased abandonment of pets, decreased prosecution and so forth).

Negative impacts identified included an increase in the cost of temporary housing to cover extra costs associated with implementation of the Code. This may lead to animals being left unattended at home when owners go away. There may also be higher debt burden and risk in the boarding industry and more obligations placed on poorly resourced animal welfare

organisations such as the SPCA. Benefits of the Code are unlikely to come to full fruition unless minimum standards are made directly enforceable.

14. Throughout the period the Code was under review, subcommittee members worked in collaboration by email, and in consultation with the staff of the animal welfare team in the Regulation & Assurance branch of MPI. A copy of the summary of submissions (anonymised) and NAWAC's responses is attached to this report in Appendix I.
15. The subcommittee reported the Code back to NAWAC on 5 August 2015 for final consideration and approval for recommendation to the Minister. The Code was subsequently peer reviewed by Professor Kevin Stafford, Professor of Applied Ethology and Animal Welfare, Animal Welfare Science and Bioethics Centre, of Massey University, Palmerston North.

Key issues

16. NAWAC considered that there are a number of minimum standards contained in this Code (which are not outlined below), where it is clear that, according to good practice and scientific knowledge, they are the minimum necessary to ensure the purposes of the Act will be met. These require no further explanation for their inclusion.
17. The following key issues represent aspects raised during public consultation on the draft Code:
 - Detail contained within Code
 - Scope
 - Access to water
 - Grooming
 - Definition of quarantine and isolation
 - Communal housing for cats
 - Night boxes for dogs
 - Barking collars/electronic devices
 - Sale and rehoming animals that are sick, injured, or diseased
 - Desexing
 - Microchipping
 - Contingency planning for emergencies
 - Water quantity in aquariums
 - Euthanasia of fish by freezing
 - Quality Management
 - Economic impact

18. Detail contained within the Code

The initial draft Code, submitted to NAWAC by the New Zealand Companion Animal Council, contained more detailed information around the care of different animal species in temporary housing facilities than does the current Code. NAWAC acknowledges that different animal species may have different requirements for their care, and this was taken into account during the development of the Code. However, some detailed species specific information that was contained in the initial draft was removed in order to bring the Code in line with the format of other codes of welfare and Act requirements.

19. Scope

The definition of companion animal for the purposes of this Code is broad, applying to any animal that lives with humans as a companion and is dependent on humans for its welfare. Many species of animals may be kept as a companion, so the Code also applies to horses and other companion animals in temporary housing facilities, including animals traditionally thought of as farmed animals. The Code also applies to stray or unowned animals kept in temporary housing facilities for companion animals, such as stray cats and dogs in pounds and shelters.

NAWAC also held discussion on whether veterinary clinics, foster homes, and training facilities should be included in the scope of the present Code.

Veterinary Clinics

It was suggested by some submissions that veterinary clinics should be covered by the present Code. NAWAC considers that veterinary clinics do not provide housing *per se*, but instead provide care and treatment for animals that are sick or recovering from surgery. The needs of these animals are fundamentally different to those housed in temporary housing facilities that are covered by the present Code, for example, in a veterinary clinic, providing an injured or sick animal access to exercise may be detrimental to its health as it may interfere with recovery and/or healing. Veterinary clinics are nevertheless bound by the Animal Welfare Act 1999 to meet the needs of animals in their care and to avoid unnecessary or unreasonable pain or distress being caused to the animals. NAWAC has therefore decided not to include veterinary clinics in the scope of the present Code. Boarding facilities providing non-veterinary services that are attached to or run by veterinary practices are, however, within scope.

Foster homes

Foster homes are often used by animal rescue organisations, in particular the SPCA, to help with capacity, disease control, enrichment, socialisation and to help animals adjust to living in a home environment. Foster homes are usually private homes where foster animals will live as if in a permanent home, but will be returned for adoption purposes. People running foster homes for animals may not therefore be able to meet some of the minimum standards set out in the current Code, in particular the ones regarding housing and facility management. However, people fostering animals will need to comply with the minimum standards as contained in other codes of welfare, such as the Animal Welfare (Companion Cats) Code of Welfare (2007) and the Animal Welfare (Dogs) Code of Welfare (2010) to ensure the welfare of the animals under their care. People in charge of other animals which may be fostered out, but which are not covered by an individual code, such as guinea pigs, rabbits, birds, rats or

mice, are still obliged under the Animal Welfare Act 1999 to meet the needs of animals in their care, and to avoid unnecessary or unreasonable pain or distress being caused to the animals. NAWAC considers that the business or organisation that utilises fosterers has the responsibility for ensuring appropriate, robust protocols are in place when selecting foster homes, to ensure the environment is safe and appropriate for the animals being cared for, and so have not included them within the scope of this Code.

Training facilities

The draft Code recommended to NAWAC by the writing group included ‘on-location training facilities’ within the scope of the Code. These training facilities include businesses that train or break in dogs and horses. In some cases, owners send their animals away from home to be temporarily housed in these facilities. NAWAC considered that training facilities should be out of scope of the Code for similar reasons to those given for the exclusion of foster homes. However, people training animals are obliged under the Animal Welfare Act 1999 to meet the needs of animals in their care.

20. Access to water

The draft Code released for public consultation required that animals in temporary housing facilities were provided with continuous access to water. However, this did not take into consideration that there are circumstances in temporary housing facilities where this may not be desirable (e.g. the use of communal water bowls in dog exercise areas may increase disease transmission risks). The minimum standard relating to the provision of drinking water for terrestrial animals has been amended and now requires frequent access to water. An example indicator for this minimum standard states that palatable water is available at all times within enclosures.

21. Grooming

The draft Code released for public consultation required that animals must be groomed as appropriate to each species. However, there was some concern that this requirement could have resulted in animals being turned away by temporary housing facilities if the people responsible at the temporary housing facilities considered that they did not wish to groom an animal for any reason, which may have resulted in owners leaving animals alone at home or in the care of inexperienced people. There was also concern that housing facilities could be seen as a cheap grooming service. While this minimum standard has now been removed, the example indicator stating that no animals exhibit pain or distress due to matting of hair or overgrowth of claws, horns, teeth or beaks, has been retained.

22. Definition of quarantine and isolation

Health maintenance is essential for animals in temporary housing facilities. It is therefore necessary to limit the importation and spread of disease and have appropriate policies in place. While the current Code addresses these aspects, several submitters were concerned that the terms “quarantine” and “isolation” were used interchangeably in the Code thereby causing unnecessary confusion. This has now been clarified throughout the Code and the definitions stated in the glossary as follows:

Quarantine facility: A holding facility where incoming animals or animals of unknown health status are kept to monitor for any signs of contagious disease or behavioural issues.

Isolation facility: A facility to house animals known or suspected to have a contagious disease.

23. Communal housing for cats

The original draft Code that was presented to NAWAC included a ban on communal housing for cats. The reasons included that cats are not normally considered social animals, and that food and water intake is difficult or impossible to monitor in communal housing. NAWAC believes that, with appropriate management, communal housing can be operated in a way that is acceptable for cat welfare. To ensure that communal housing is managed appropriately, a minimum standard has been added requiring that where animals are housed or exercised communally, care must be taken to manage groups to avoid aggressive interaction. In addition, a recommended best practice states that cats should be provided with high level spaces and areas in which they are able to hide.

24. Night boxes for dogs

The original draft Code that was presented to NAWAC proposed that the committee consider disallowing the use of night boxes for dogs. Night boxes consist of kennels with no run and are intended to confine dogs for sleeping only. The current Code requires that every animals' behavioural needs are met and NAWAC has added a minimum standard to this effect stating that animals in temporary housing facilities must have sufficient space to socialise, rest, sleep, stand, stretch, swim, fly or move freely about (as appropriate to the species). As this is the case, NAWAC has added an example indicator that dogs are not housed permanently in night boxes. In addition, NAWAC has also added a minimum standard that dogs need to receive daily exercise sufficient to maintain their health and well-being.

25. Barking collars/electronic devices

Some public submissions raised concerns regarding the use of electronic training devices in temporary housing facilities. While most submissions on the minimum standard relating to behavioural needs considered that electronic training devices need not be used in temporary housing facilities, one submission suggested that barking dogs that cannot be quietened by other means could be placed into a sound-proof kennel or fitted with a bark collar. The use of electronic training devices is not banned in New Zealand, but requirements around their use are outlined in the Animal Welfare (Dog) Code of Welfare (2010). Hence NAWAC has included a minimum standard that electronic collars are only to be used in temporary housing facilities with the written consent of the owner, under supervision of qualified and experienced persons and in a way that does not compromise the welfare of the animal. However, NAWAC considers that incorrect use can significantly reduce the long term welfare of a dog and as such NAWAC has added a recommended best practice that electronic training devices should not be used in temporary housing facilities.

26. Sale and rehoming animals that are sick, injured, or diseased

It is an offence under the Act to sell an animal when it is suffering unreasonable pain or distress, unless it is for the purpose of killing the animal. A minimum standard in the Code requires that animals that are suspected or known to be sick, injured, or diseased must not be

sold or rehomed without full disclosure to and acceptance by the new owner. The minimum standard allows animals that are sick, injured or diseased, but which are not suffering unreasonable pain or distress (either due to the mild nature of the injury/disease or due to adequate intervention such as medication or veterinary care), to be sold. NAWAC considers that full disclosure to and acceptance by the new owner is required under such circumstances to ensure that the animal will receive appropriate treatment to ensure that its welfare will be maintained in its new home.

27. Desexing

Many submitters, including the 15 identical email submissions, strongly supported the minimum standard to require desexing when companion animals are sold or rehomed where they are of a species and age for which such procedures are routine. The reason given was that there are thousands of animals bred each year without care for their future welfare and they may be euthanised if there are not enough homes for them. Some made submissions to change the minimum standard from 'where routine' to 'where surgically possible', in order to allow for the possibility of early desexing of dogs and cats if required.

NAWAC considers that it is beyond the scope of this Code to provide for compulsory desexing of animals through minimum standards, and this is in line with other codes. However, NAWAC considers that temporary housing facilities can have a high impact on companion animal overpopulation and its associated animal welfare issues, and that they therefore have a responsibility to address this. NAWAC has therefore included a recommended best practice that all animals being sold or rehomed from a temporary housing facility should be desexed, or have an arrangement in place to ensure desexing, if they are of a species and an age for which such procedures are surgically possible.

28. Microchipping

Some submissions suggested that dogs should be microchipped prior to sale or rehoming. While NAWAC acknowledges the importance of microchipping, this is covered by the Dog Control Act 1996 and is beyond the scope of a code of welfare. However, NAWAC has included a recommended best practice that cats should be identified with a registered microchip prior to sale or rehoming.

29. Contingency Planning for Emergencies

Several submissions supported the inclusion of contingency planning within the Code. Such procedures need to be in place for emergencies such as fire, flooding or a power cut to ensure the welfare of the animals, and staff need to be made aware of these procedures and trained accordingly. NAWAC has therefore included a new section on contingency planning including a new minimum standard that staff must be suitably trained to respond to an emergency. In addition, recommended best practice for this minimum standard states that emergency warning devices and emergency evacuation procedures should be in place and that at least one member of staff should be on site at all times and be able to assist the animals in case of an emergency.

30. Water quantity in aquariums

The original Code that was recommended to NAWAC contained a minimum standard that all aquariums must have a water volume of 4 litres or greater, regardless of the species or number of fish kept in them. Since fish are in intimate contact with their environment through the huge surface of their gills, water quality is one of the most critical aspects of the environment for fish welfare (Huntingford et al, 2006). Increasing density of fish in a limited amount of water has adverse effects on water quality. Aquatic and semi-aquatic species are reliant upon water of an appropriate quantity and quality to meet their behavioural and physiological needs.

There was concern raised by some submissions regarding the feasibility of providing a minimum water volume of 4 litres in aquariums housing Siamese fighting fish (*Betta splendens*). Male Siamese fighting fish have been selectively bred for fighting each other (Verbeek et al, 2007). They are therefore housed alone in pet shops, either in small pockets of water within a bigger tank or in small aquariums connected to the main filtration system. Both methods ensure that the animals can experience the water quality of a larger aquarium despite being kept in water volumes under 4 litres.

NAWAC has therefore included a minimum standard to state that ‘unless specifically contraindicated for certain species, aquariums must have a water volume of 4 litres or greater’. Other minimum standards in this section require that water of an appropriate quality must be provided for any particular species of aquatic animal being held and that water chemistry must be checked regularly and appropriate measures taken to correct any imbalances.

31. Fish euthanasia by freezing

One of the submissions raised the point that freezing may be an appropriate method of euthanasia for some aquatic species. While hypothermia is an unacceptable method of euthanasia for mammalian companion animals (AVMA 2013), NAWAC discussed whether freezing may be an acceptable form of euthanasia for fish.

Euthanasia by freezing, also referred to as rapid cooling, can be achieved by immersion in an ice water bath (ice-slurry) that is between 0-4°C. Generally, we do not know how aversive ice water immersion may be for fish. If extrapolated from human experience, immersion in ice water may initially be painful (Robb and Kestin 2002). Unfortunately, little research has been conducted on this topic.

Rapid cooling may be an acceptable method of euthanasia for zebrafish (Wilson et al, 2009, Matthews and Varga 2012) and, potentially, for other small warm water fish (Blessing et al, 2010). Studies show that all vital signs as well as responsiveness to stimulation ceased within 20 seconds of zebrafish being transferred to ice water (Wilson et al, 2009). It was acknowledged that the fish, with their small body size and weight, lost heat rapidly and did not have the physiological tolerance limits or adaptation mechanisms to adjust to rapid exposure to ice water (Matthews and Varga 2012). However, this may not be so for larger fish and for temperate or cold water species.

Body size and species-specific thermal tolerance are both important factors to take into consideration when assessing whether rapid cooling is an acceptable method of euthanasia (Blessing et al, 2010). They will determine the period between immersion into ice water and

the onset of hypothermia and subsequent unconsciousness, and hence the period during which animals can suffer from the effects of ice water immersion. Larger fish will lose body temperature more slowly than smaller fish due to their smaller surface area-to-volume ratio, and cold-water fish have a lower cold tolerance than subtropical or tropical fish (Blessing et al 2010). Therefore, these fish would take longer to become unconscious which would extend the period of potential suffering.

NAWAC has retained the minimum standard that animals must not be killed by freezing, as currently there is not enough evidence to suggest that this is an acceptable method of euthanasia for all types of fish.

32. Quality management

NAWAC has removed the minimum standard relating to quality management. As noted in submissions, there is currently no governing body in New Zealand to review and enforce a quality management scheme for temporary housing facilities to ensure compliance.

33. Economic impact

Some submissions commented on economic impact of the Code. They were concerned that the Code would require changes to be made to their current operations in order to comply with the minimum standards, including costly changes to buildings, such as instalment of temperature control systems and quarantine facilities, increase in staffing, additional computer software and other equipment. NAWAC acknowledges the concerns raised. However, it believes that the minimum standards of the present Code are the minimum necessary to ensure the welfare of animals in temporary housing facilities.

Other issues considered by NAWAC

NAWAC has considered how the Code aligns with other relevant codes and regulations both in New Zealand and internationally. NAWAC is not aware of any examples where the Code deviates significantly from these standards.

34. Matters in the Code that should be dealt with by regulations

At the time of writing, NAWAC has not identified any matters in the Code that should be dealt with by regulations under the Act. NAWAC may reconsider recommendations for regulations before the Code is reviewed where this is deemed necessary to safeguard animal welfare.

35. The nature of any significant differences

All significant differences of opinion about the Code, or any of its provisions, have been set out above or in NAWAC's response to submissions.

Dr Gwyneth Verkerk

Chair, National Animal Welfare Advisory Committee

15 March 2018

References

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Appendix I: Summary of submissions from public consultation

Please note that all numbered references for the minimum standards in this report are specific to the draft code dated 25 June 2014 as circulated for public consultation. Due to additions and deletions, numbering in the final code as issued by the Minister will vary from the draft code circulated for public consultation.

General Comments

No.	Comment	NAWAC Response
1	A cat that is stress free is much less likely to shed any virus's it may be carrying, and other cats are less likely to contract virus's if not stressed. With cats its imperative they remain stress free while in temporary housing.	Noted
2	The sale and rehoming of companion animals is widespread through animal welfare agencies, pet shops, Trade Me, and individuals. It is important for the long term health and well-being of such animals that high standards are set to cover these practices. This Code provides the opportunity to do just that. Therefore we strongly recommend that the clauses currently sitting under Recommended Best Practice be moved to Minimum Standards as described.	Noted. Will review RBPs with this in mind.
5	<p>Adoption of the standards embodied in the code by those that most need to will only happen if there is an element of compulsion attached. The largest barrier to the code being adopted will be a lack of compulsion to comply.</p> <p>A strong code (i.e. one with a much increased element of compulsion) would be a strong disincentive to the existing internet trade in live animals, in particular fish and give an advantage to professional establishments that provide a high level of animal care and ongoing advice to buyers.</p> <p>Compliance costs for businesses that already have high animal welfare standards would be negligible or zero. For those that currently have poor standards compliance costs may include the installation of new holding facilities, the hiring of more and/or better trained staff, training of existing personnel, institution of new and improved operating procedures and in some extreme cases it may drive them out of business entirely. This is as it should be. After all the purpose of a code of practise is to institute a set of standards that achieve improved animal welfare objectives and only by the improving or removing of poor operators can this be achieved.</p> <p>Above all. It is our strong belief that this code should contain provision for compulsory licensing of all facilities that house companion animals temporarily and in particular pet shops. This is the case in an increasing number of countries overseas and it is a concept that has strong support from with the NZ retail pet industry.</p>	<p>Noted</p> <p>Compliance is improving. Legal prosecution is a reasonable deterrence for most.</p> <p>Noted</p> <p>Noted, too prescriptive</p>

<p>6</p>	<p>VCNZ welcomes the development of this Code and the clear delineation of minimum standards and outcome indicators. It questions however, whether the Code's generic nature risks compromising the intended outcomes.</p> <p>Definitions For example the draft definitions of 'temporary housing facilities' and 'companion animals' are very broad. We understand that the Code is designed to capture the widest section of the 'temporary housing' population. However this broad approach may mean that the variances between the facilities and species which fall under these definitions are not adequately addressed. This could pose risks to successful prosecutions. Note that the Appendix refers to the definition of 'temporary housing' in section 2 of this Code, it should read section 1.</p> <p>Terminology Further consideration could be given to the wording used in the Code. Terms such as 'stockmanship' and 'dung/manure' are more commonly used in agricultural and production animal settings.</p> <p>Legal review VCNZ assumes that the Code will be subject to legal review to ensure consistency with the primary legislation and to avoid technical legal defences. For instance the Code refers to "extreme and unacceptable pain" but the Animal Welfare Act 1999 refers to "unreasonable or unnecessary pain or distress".</p> <p>Owner's consent for veterinary treatment We question whether there should be specific mention in the Code of the need to gain the owner's written authority to seek veterinary attention (including euthanasia) if they are unable to be contacted. This could be done when the animal is admitted to the temporary housing to cover the duration of its stay.</p>	<p>Noted. Lots of debate went into generic vs. overly prescriptive.</p> <p>Noted. Changed section in appendix</p> <p>Stockmanship changed to animal handling. Dung changed to faeces.</p> <p>Yes codes are legally reviewed. Changed wording to unreasonable/unnecessary.</p> <p>Added to MS 4 and associated EI's.</p>
<p>7</p>	<p>We Support The document in it's entirety and in particular ALL of Minimum Standard 15 (Sale or Rehoming)</p> <p>We Suggest the Addition of;</p> <p>1) All found/stray animals be <u>publically notified</u> for a minimum period of seven days (this includes all pounds, shelters, SPCA and all other temporary housing facilities for animals.</p> <p>Further, we suggest that there should be one nationwide vehicle for this public notification which is free to use and easy to access. (We realise we have bias in making this specific comment), however we recommend that medium for public notification should be www.petsonthenet.co.nz</p> <p>2) That catteries, kennels and boarding facilities be required to use some form of identification to identify pets whilst in their care (possibly a paper collar for cats, collar for dogs with some type of ID system)</p> <p>Reason: We are aware of several circumstances in the past few years alone where catteries have given the WRONG cat back to owners in a cat cage.</p> <p>3) That catteries, kennels and boarding facilities be required to advise the owner within a set period* of time if their pet is lost or has escaped their facility</p> <p>Reason: We have several cases known to us where a cat has gone missing from a cattery or boarding facility and the owners are NOT advised for many days or even until they actually go to pick the cat up...Furthermore to make matters far worse in these cases the facility has made no efforts whatsoever to advertise the animal as lost...</p>	<p>Added to general information</p> <p>Noted, see Part 11 Quality Management</p> <p>Added to RBPs and general information MS 4</p>

	<p>4) That temperament testing for dogs be standardised throughout NZ and that temperament testing be a requirement for all dogs for adoption/sale In Minimum Standard 15 (d) you mention temperament testing. However, we believe this needs to be teased out much further. We suggest that a nationwide standardised temperament test for dogs be CREATED and adopted as standard practice so that all dogs are tested exactly the same way throughout NZ.</p> <p>5) Current Pet First Aid Certificates That all workers in temporary accommodation for animals should have an up to date Pet First Aid certificate as a minimum qualification. This should include kennels, catteries, pet shops and “doggie day care”</p>	<p>Noted but standardised testing will not be created in this code</p> <p>Noted, too prescriptive</p>
14	<p>I attended the NZ Companion Animal Council meeting today and Bob Kerridge suggested I write an email regarding an issue I raised – that of the housing for greyhounds.</p> <p>Greyhounds often live in corrugated iron barns – with variable light. Trainers house and train dogs belonging to other owners, as well as their own dogs. The dogs may live with the trainer for a few months (until they stop winning – they are then mostly killed). Some dogs may live with the trainer for a couple of years. Few greyhounds race beyond 5 years, so the housing is temporary, but can be for longer periods.</p> <p>Footage obtained from the property of one of the top greyhound officials is shown on the link below (starting at 14.20). [description of footage]</p> <p>I would like it if you were able to make use of this information in whatever parts of the review of the AWA are appropriate.</p> <p>The link is here - http://www.3news.co.nz/Shocking-new-greyhound-revelations/tabid/1771/articleID/321231/Default.aspx</p>	<p>Greyhounds are covered by the dog code of welfare and AWA itself</p>
16	<p>Thank you for your desires to do the right things, and the opportunity to comment. Please be mindful of the consequences of setting what may be notionally admirable ideas and expectations, from the comfort of a committee room, for implementation in our world of constant barking, picky owners, potential dog-fights, potential dog-bites, diarrhoea, rain and mud, wage bills, ACC payments, dogs not eating, dogs getting sick, owners doing a runner without paying, facility upgrades, financial constraints and lack of family life (all of which we choose).</p>	<p>Noted</p>
19	<p>Putting aside the trepidation and added risk and responsibility this process presents, we welcome the formalisation of our Industry through this Code as a challenge to tackle. We ask that you consider carefully the magnitude of the adjustments this will require to this delicately balanced industry, and the face of dedicated people like us that come under this process.</p>	<p>Noted</p>
21	<p>In responding to the draft consultation document it seemed logical to include as many of those original writers as possible who were well acquainted with the content of the draft to comment, and accordingly arranged a meeting on Monday 28th July, 2014, to evaluate and provide our general recommendations. Our response includes many of those recommendations and accordingly represents a large consensus view from the original authors.</p> <p>In general the contributors noted that the draft document was substantially different to the original submitted, and in particular that the separated recommendations by species had been deleted. This may have been for practical reasons given the size of the original document, however in the matter of housing and the specific needs of some species it was generally felt that the document is lacking that particular advice which diminishes the value of the Code.</p>	<p>Noted but not added to Appendix – changes were made because original was too long/to bring document into line with other codes of welfare and Act requirements</p>

	<p>It is therefore felt that this information should be included somewhere in the document either as an appendix, or under the appropriate indicators relative to housing design. We do not believe these need be minimum standards, but guidelines as to appropriate housing for those species detailed. (See note and references on page 18 of the tracked version).</p>	
<p>26</p>	<p>I have lived on a lifestyle block for 15 years close to a 50 dog boarding kennel.</p> <p>Although my primary concern has been for the amount of noise from barking and the effect that has been on our right to reasonable peace and quiet; I have also been very concerned about the animal welfare issue, of dogs being left to bark continually and abnormally for hours on end and the obvious stress these animals have suffered.</p> <p>I have been concerned enough to notified both the SPCA and Tasman District Council animal control personnel, when I had observed (and recorded) individual dogs whining, squealing and barking for hours on end. That there was never any improvement in the situation and that the animals were left in their obviously distressed state after my notification, I can only surmise my concerns were ignored.</p> <p>The fact that this is a commonly recurring event shows that neither the kennel owner nor the authorities considered the animals are distressed.</p> <p>My concerns about this draft proposal are as follows:</p> <ul style="list-style-type: none"> • From my experience I have found that leaving legislation with subjective, undefined and non prescriptive terms, leaves it open to interpretation as and how the enforcing authority sees fit. The end result is that the enforcing authorities interpret the legislation as unworkable and thus are reluctant to enforce anything. • Although making reference to and admitting the stress involved when taking an animal from its home environment and placing it in completely unfamiliar environment, this proposed legislation legitimises the practice. • There is no objective procedure prescribed when an animal is distressed. No indication of what steps should be taken to alleviate the animal's stress and what steps should be taken when they fail and are at a complete loss of what to do. • Use of bark collars or a sound-proof kennel should be mandatory. Somehow a persistent barker should be quietened rather than being left until they become hoarse and unable to bark anymore. To just leave a stressed animal to carry on vocalising is hardly addressing its distress. In our situation although 4 sound-proof kennels were a requirement of the kennel's consent it has never been enforced by the TDC, despite my continual request that they do so. • Although it is commendable that animal welfare conditions are being addressed with legislation, it should not take precedence over human rights. <p>I have included a spreadsheet with recordings taken over 10 minute periods on particular days throughout the year. This shows the amount of time animals are left barking, often particular animals.</p>	<p>Noted but this is a council issue. Added policy to deal with persistent barking as RBP.</p> <p>Noted. Code was written with the aim of not being prescriptive</p>
<p>28</p>	<p>Throughout the draft Code, the terms 'quarantine' and 'isolation' have been used interchangeably, this needs to be corrected. Isolation is used for sick/unwell/diseased animals, while quarantine is the process of segregating animals that are not showing clinical signs of disease while they are assessed. The code needs to set a standard of correct use of these terms.</p>	<p>Agreed and changed</p>

Specific Comments

Section	No.	Comment	NAWAC Response
Background	21, 22, 28	It is noted that this is likely to change with the Animal Welfare Act amendments.	Noted
Who should read this code	3, 12, 20, 21, 22	Add “foster homes” into the temporary housing facility list.	Disagree; may not have same facilities, don't want to prevent fosterers from being able to foster, organisations like the RNZSPCA provide guidelines already
Who should read this code	21, 22, 23	Add “veterinary clinics” into the temporary housing facility list. Veterinary practices and education providers should be leading by example, ensuring best animal care outcomes and meeting client/owner expectations.	Disagree – medical situation is different, may not be able to meet all of these standards
Who should read this code	3, 19	I also think that people who engage people to look after their pets (in their own home) while on holiday should come under this category. They often have no training, so to do this they should have at least an Animal Care Certificate or something similar	Disagree to specifically list but may be covered depending on case
Who should read this code	17	“This is intended for all persons responsible for the welfare of animals in a temporary housing facility for companion animals, including...” we submit that this should be re-expanded to a definitive list to ensure clarity of establishments that it applies to OR should read “including but not limited to”	Agree – changed to ‘including but not limited to’
Who should read this code	28, 11	The RNZSPCA believes that ‘casual’, home breeders i.e. Trade Me sellers, should also be included in this Code of Welfare. PIA recommends that as the majority of companion animals are now sold through TradeMe the standards of the Code should equally apply to all animals sold through avenues such as Facebook and TradeMe.	Disagree to specifically list but may be covered depending on case
1.1 Application	4	Last paragraph, “Maintaining a high standard of animal welfare in a temporary housing facility can be a challenge, and requires particularly strict attention to behavioural needs and hygiene standards.” – including environmental enrichment.	Included in MS 7 This sentence moved from Application to Purpose
1.1 Application	23	The Code of Welfare: Temporary Housing of Companion Animals provided for review does not explicitly state in Part 1. Section 1.1 veterinary practice/s and education providers and in our opinion these areas should be specifically listed . Temporary housing	Disagree, see above

		requirements in both these industry areas are currently omitted from the Code and are not covered, to our knowledge, in any of the other Codes of Animal Welfare or industry standards e.g. NZVA BestPractice T.	
1.1 Application	28	<p>Foster homes are unlikely to be able to meet many of the minimum standards in the draft code, purely because the environment is entirely different to that of a pound, pet shop or animal welfare facility. The RNZSPCA believes that it is up to the business or organisation that utilises fosterers, to ensure appropriate, robust protocols are in place when selecting foster homes, to ensure the environment is safe and appropriate for the animals being cared for.</p> <p>It is for this reason the RNZSPCA submits that 'or to foster homes utilized by many not-for-profit organisations' be included in 'Application' at the end of section 1.1.</p>	Foster homes not included
1.1.1 Temporary Housing Facilities	17, 21, 22	SPCA Waikato submit that Veterinary clinics must be covered in this code - there is no industry standard for the housing of animals in veterinary clinics - the Best Practice accreditation will only be requested by those clinics with excellent facilities already, those clinics that, for whatever reason, fall below standard are not audited by any body. We have, in fact, had communications with vets who are very concerned that vet clinics do not fall under this code.	Disagree, see above
1.1.1 Temporary Housing Facilities	26	"This takes priority over every other consideration" – including human rights?	Noted, re-worded
1.1.2 Companion Animals	2, 20	Add "and foster homes" at the end of the second paragraph, after "....." in pounds, [and] shelters."	Disagree
2 Responsibilities, Competency and Stockmanship	12, 21, 22	<p>Introduction Add "both staff and volunteers" after 'their personnel' in line 3.</p> <p>Add at the end "The liability for suitable training rests with the employer, owner, or controlling organisation."</p>	Information on the person in charge is contained under general information. Staff definition includes volunteers.
2 Responsibilities, Competency and Stockmanship	28	<p>The RNZSPCA submits that 'personnel' be replaced with 'staff and/or volunteers' in this parts introduction paragraph so as to read- "....facility for companion animals need to ensure that their staff and/or volunteers have either the relevant knowledge..."</p> <p>The RNZSPCA submits that 'and/or staff' be included after 'manager' in section 2.1, paragraph 1, to read- ".....from the legal owner of the animal to the manager and/or staff of the housing facility....."</p>	Disagree, staff definition includes volunteers
2.2 Competency and Stockmanship	4	<p>Since these are companion animals, would animal handling be a better wording option than "Stockmanship"?</p> <p>Example Indicators</p> <ul style="list-style-type: none"> • Add: Ensuring environmental enrichment is undertaken and the importance is understood. • Add: Knowing when to call for or seek Veterinary advice. • Emergencies: Define - animal or other? • Inspection: Inspection of animal or environment? Both? 	<p>Agree and changed</p> <ul style="list-style-type: none"> • Added • Added • Noted, see also contingency planning • Noted, changed

		<p>Recommended Best Practice</p> <p>Add: And continuing development of this practice ensuring best practice is continued.</p>	Not changed
2.2 Competency and Stockmanship	3	<p>Working staff to have a minimum training of Animal Care Certificate or 5 years working with cats in a cattery or dogs in a kennel. The facility to have at least 1 Veterinary Nurse on site or available in the case of emergencies.</p> <p>All properties to be accredited, maybe by AsureQuality.</p>	Disagree, but see RBP
2.2 Competency and Stockmanship	12, 20, 21, 22, 28	<p>MS 1 Add to (a) “professional” before competence.</p> <p>Under EI's - An additional point needs to be added which reads 'Records of the training of staff and volunteers are kept'.</p>	Not changed (in line with other codes) Already incorporated (EI 2)
2.2 Competency and Stockmanship	12, 20, 2	<p>(b) add “Persons in charge” before staff.</p> <p>Add “(c) Staff must have access to appropriate training and supervision.” This is referred to in the Introduction, and therefore a concomitant Minimum Standard is appropriate.</p> <p>Add to Documentation includes....</p> <ul style="list-style-type: none"> • “Reporting to a Management Committee or Board on the operation of each temporary housing facility.” <p>The management body of each Temporary Housing Facility must receive robust reports from the senior staff of the facility in order to be able to fulfil their management obligations.</p>	<p>(b) removed to its own section</p> <p>(c) implied by MS and EI's already</p> <p>Agree, but not as a new MS, see Part 11 Quality Assurance</p>
2.2 Competency and Stockmanship	12, 20, 22, 28, 5, 17, 21	<p>MS 1 change to</p> <p>(b) Staff and persons in charge must be suitably trained to handle an emergency,. and have a written evacuation plan. (We submit that persons in charge is necessary for this standard as not all temporary housing facilities have “staff” many rescue groups and training establishments are set up and run by individuals.)</p> <p>at least one person on duty or available at any given time must hold an animal husbandry qualification of NZQA level 3 (or equiv, or at a higher level) - We submit that this must be a minimum requirement to ensure an appropriate level of knowledge.</p>	<p>(b) removed to its own section</p> <p>Disagree (too prescriptive)</p>
2.2 Competency and Stockmanship	21, 28	New EI – “records of the training of staff and volunteers are kept.”	Already incorporated (EI 2)
2.2 Competency and Stockmanship	26	<p>“species-specific animal behaviour, general signs of distress, and indicators of poor animal welfare such as stress, pain and fatigue, and their management”</p> <p>Does this include being competent in the handling of dogs barking continually? How are barking dogs dealt with?</p>	Added policy to deal with persistent barking as RBP

2.2 Competency and Stockmanship	28	<p>Minimum Standard No. 1 (b) be moved to a new section (explained later) called "Civil Defence and Emergency Management"</p> <p>Persons in charge' be included</p> <p>The wording 'to handle an emergency, e.g. fire evacuation' be replaced with 'to respond in adverse events'.</p>	<p>Agree, but slightly different title</p> <p>Agree, changed</p>
3.1 Food and Feeding	4	<p>Example Indicators</p> <p>EI 6: Is an explanation required here as regards isolation?</p> <p>Recommended Best Practice</p> <p>Scouring - Diarrhoea? Scouring is usually used as a description for cattle, calves, foals etc. I would not advise the feeding of bones in any facility. This can lead to issues with foreign bodies and potential complications.</p>	<p>Isolation vs. quarantine changed throughout code (defined in Appendix)</p> <p>Changed to diarrhoea. RBP removed</p>
3.1 Food and Feeding	4, 20, 21, 22, 28	<p>Change faeces to dung as it refers to companion animals</p>	<p>Agreed and changed</p>
3.1 Food and Feeding	12, 20, 21, 22, 28	<p>Age needs to be added here, after species.</p> <p>2 (a) ii: Cold' needs to be changed to 'adverse elements'.</p> <p>Example Indicators:</p> <p>In bullet point 6: remedy the "underlying" problem"</p> <p>Recommended Best Practice (a) should read:</p> <p>"If feeding processed food it should be obtained from reputable manufacturers or suppliers."</p> <p>D should be deleted.</p> <p>E should read 'sought, and adhered to'</p>	<p>Agree</p> <p>Disagree (in line with codes like the dog code)</p> <p>Agree – changed</p> <p>Noted – changed but in a different way</p> <p>D deleted</p> <p>Noted, not changed</p>
3.1 Food and Feeding	28	<p>'Illness, age' be included in Minimum Standard No. 2 (a) (ii)</p> <p>The RNZSPCA submits that a second minimum standard be added which reads "Prescription diets for certain medical conditions must be fed as instructed by a veterinarian."</p> <p>We agree it would be inappropriate to attempt to list an exhaustive description of required diets however we feel that animals requiring a prescription diet should be fed the prescribed diet in all circumstances. This is crucial to ensure the welfare of the animal in question and is merely a matter of good practice in our opinion.</p> <p>The RNZSPCA believes that the reference to 'normal' faeces used in Example indicator point 5 is vague and open to interpretation.</p>	<p>Age added to MS 2</p> <p>Noted. Feel that MS 2 already covers this (enables each animal to maintain good health).</p>

		Therefore, the RNZSPCA submits that a tool such as the 'Bristol Stool Chart' is used for feline and canines and referenced in this Code, replacing the term 'normal' with 'Type 3-4' – refer Bristol Stool Chart attached in Appendix A of this submission.	Noted. Could be part of a QA programme, but seems overly ambitious for code.
3.1 Food and Feeding	5	We recommend that an additional paragraph be added after e). <i>f) Foods suitable to meet the various dietary and feeding strategy requirements of any fish being housed must be provided.</i> This would mean that those fish that are for instance vegetarian, or bottom feeders, or surface feeders, or that feed by scraping, or that require large or small particle sizes must be catered for. It is quite common to see any fish with specialist feed requirements quietly starving to death in some pet shops and aquaria at present.	Already covered Noted
3.1 Food and Feeding	12, 17, 21,20, 28	'Food and water bowls or bottles' should be replaced with 'Utensils and containers used for food preparation' An additional minimum standard should be added: 'Food must be prepared hygienically and stored appropriately'. RBP (c) We submit that this is just not practical or necessary in all situations. In fact in many feeding regimes food is topped up as necessary.	Changed under hygiene section It is RBP only
3.1 Food and Feeding	15	Example indicators for minimum standard No.2 – Food and Feeding <ul style="list-style-type: none"> • A reserve supply of feed and water is maintained on site, sufficient for the maximum facility capacity for at least 72 hours in case of an emergency. <p>EI 4 has implications in a boarding kennel situation as some dogs are not easily weighed, due to their hyper activity. This could also stress a dog as it could be seen as visiting the veterinarian. Weights of all mammals may vary from day to day due to when they were last fed or toileted. For practicality of use we would need a set of scales at our office/reception and again within the kennels facility at a minimum cost of \$1650.00 per set of veterinarian grade weigh scales. We would also need a set of scales in both our cattery and, isolation areas to keep within the standard of not spreading disease. This will also incur the 6 monthly on-going cost of getting the scales checked and certified.</p>	Restating EI? Noted – can use body condition score
3.1 Food and Feeding	17	MS (a) (ii) ...meet its physiological demands, including those resulting from pregnancy, lactation, growth, age, exercise, and exposure to <i>adverse elements</i> ; we submit that these additions complete the list RBP (d) Submit that this is too species specific and not necessary. The issue is covered off appropriately elsewhere. (c) Veterinary or expert guidance should be sought and adhered to (we submit that just seeking advice is not enough) on nutritional needs for every species held in a temporary housing facility.	Age added Deleted Noted, not changed

3.1 Food and Feeding	19	Part 3.1: Food and feeding. I suggest an addition to best practice guidelines that records are kept of each guests' food type and quantity, which allows the next visit to begin from a better informed individually tailored start point, and significantly reduces the lag in detecting weight changes via weight measurements or visual assessments being repeated.	Noted, too prescriptive
3.2 Food Preparation	24	We submit that the best practice recommendation 3(a), providing that 'Water bowls or bottles should be washed daily', be incorporated as a minimum standard.	Noted. See Hygiene. It is RBP.
3.3 Water	1	I'd like to see added 'Water must remain at a drinkable temperature, and not allow to get too hot in summer.	Covered by palatable
3.3 Water	5	We suggest the following line be added to the list of example indicators. <i>"Water of an appropriate quality must be provided for any particular species of fish being held according to the specific water quality requirements of that species"</i>	Environmental rather than water
3.3 Water	28	The RNZSPCA submits that a fifth example indicator be added for Minimum Standard No. 4 to read- "Water temperature for animals living in aquatic environments is species appropriate". We believe this allows the minimum standards to apply to all companion animals. The RNZSPCA submits that 'canned food or pet rolls' be replaced with 'wet food' under the 'General Information' heading, paragraph 2 to read – "...content of the food provided. Animals eating dry food will require more water than those eating wet food." This is particularly species specific and altering this widens the scope.	Environmental rather than water Agree, changed.
3.3 Water	12	Replace 'do' with 'should'. Fourth Example Indicator: Delete: "and there is.....contamination." General Information: Add: For animals that live in an aquatic environment water must be appropriate to the species need. Delete: 'Animals eating dry food will require more water than those eating canned food or pet rolls.' Last paragraph: Change last phrase to "possibly resulting in diarrhoea."	Language matches requirements for an example indicator. Environmental air and quality section Disagree Changed
3.3 Water	15, 17, 28	EI 4 - we submit that this [documented checks] is not realistic nor necessary. I would agree with recording when something is out of the normal expectation. 28: The RNZSPCA submits that the words 'and there is documented evidence of regular checks for contamination', be removed from example indicator for Minimum Standard No. 4 so it reads- "Water bowls/troughs are clean".	Agreed
3.3 Water	17, 21, 22	Add"For animals that live in an aquatic environment water quality must be appropriate for the species requirement. - we submit that this allows the minimum standards to apply to all companion animals."	Environmental issue Language matches requirements for an example indicator.

		<p>EI 2 – change “Do” to “should”</p> <p>General Information – “Animals eating dry food will require....“ This is species specific, this sentence can be deleted.</p>	Disagree
3.3 Water	19	<p>Referring to Part 3.3 (Water), the minimum standard requires continuous access to water, while the example indicator requires only that water be available “within enclosures”.</p> <p>Can I suggest two scenarios that a well-managed facility would choose to not provide water to short duration recreating dogs:</p> <ol style="list-style-type: none"> 1) There is a suspicion of guests incubating Canine Cough, due to onsite cases in dogs that have been resident and in contact with others for 5-10days prior to symptoms becoming apparent. A decision to reduce exercise times to 15-30minutes depending on season/ time of day/ ambient temperature/specific health needs of individuals (eg age, kidney disease), and remove communal water bowls is made to limit an effective vector of transmission. 2) Recreation time duration is curtailed due to cold and damp seasonal conditions, and the limited number of wet weather suitable exercise spaces are being used by group after group. Communal sharing of water by subsequent groups poses a much greater chance for an outbreak of Canine Cough to penetrate more deeply into the boarding population, immediately pollinating different playgroups through the shared water supply. <p>Is there a need for the stated minimum standard requiring water at all times, given the subsequent (and much more important) example indicators requiring water in the enclosures (kennels), and that no animals show signs of dehydration. This is already well covered as a clear expectation that the dogs hydration needs will be met, and failure to maintain hydration is already the responsibility of the operator as per Part 2: Competency and Stockmanship, and Part 3.3: Water.</p>	Agreed, changed to ‘frequent access’
3.3 Water	24	<p>We recommend adding the following example indicators:</p> <ul style="list-style-type: none"> - ‘Evidence that animals are actually drinking the water supplied in normal quantities’. - ‘Nothing is obstructing the water supply.’ 	Disagree
4.1 Health Assessment on Admittance	2	<p>Add to (d) “or, if stray or otherwise unowned, humanely euthanased in accordance with the Act.” This addition applies to stray and unowned animals. It is often not possible or practical for a foster home or other Temporary Housing Facility to house an aggressive animal.</p>	Disagree (MS does not require the facility to keep the animal)
4.1 Health Assessment on Admittance	4	<p>MS (c). Surely any animal being admitted into a facility should be isolated for a few days initially in case an infectious disease should show? ie Parvo incubates for 5-7 days?</p>	This is quarantine not isolation – RBP in 7.5
4.1 Health Assessment on Admittance	12, 21 22	<p>4.1 Introduction paragraph 2: Change 'isolation' to 'segregation'.</p> <p>Minimum Standard No. 5 b: Change or to “and”.</p>	<p>Use of terms updated</p> <p>Disagree</p>

		<p>Minimum Standard No. 5 d Change 'any' to 'If housing any' and</p> <p>add to (d) "or, if stray or otherwise unowned, humanely euthanased in accordance with the Act." This addition applies to stray and unowned animals. It is often not possible or practical for a foster home or other Temporary Housing Facility to house an aggressive animal.</p> <p>Example Indicator 3: Change 'quarantine' to 'isolation'.</p> <p>Add to Example Indicator 5 : 'health or behavioural'. Change 'health' to 'animal'</p>	<p>Disagree (MS does not require the facility to keep the animal)</p> <p>Agreed changed throughout</p> <p>Not changed</p>
4.1 Health Assessment on Admittance	28	<p>The RNZSPCA submits that the two instances of the word 'isolation' are replaced with 'segregation' in the introduction paragraph, to read – "...special diets, bathing, grooming, and segregation of any animal that has medical or behavioural conditions or issues that affect itself, other animals or the ability of staff to care for the animal appropriately, and that would benefit from segregation"</p> <p>The RNZSPCA submits that 'and/' be inserted in Minimum Standard No. 5 (b) to read- "Any incoming animal identified as requiring urgent veterinary treatment must be immediately referred back to the owner and/or receive prompt veterinary attention."</p> <p>The RNZSPCA submits that Minimum standard 5 (c) have the wording 'for a period of no less than 10 days or until deemed fit for general population by a veterinarian' included to read – "Any incoming animal suspected of having an infectious disease must be isolated on arrival for a period of no less than 10 days or until deemed fit for general population by a veterinarian."</p> <p>The RNZSPCA believes the wording of Minimum standard 5 (c) is vague and feels that a minimum isolation time period should be prescribed. We understand that effective isolation periods will differ depending on the condition and species but feel that a minimum 10 day isolation period should be enforced for each animal identified as having an infectious disease. This is in order to prevent the spread of the disease through the facility and protect the welfare of the other animals contained therein.</p> <p>The RNZSPCA submits that Minimum Standard No. 5 (d) be reworded to read- "If an animal that is assessed as being aggressive, either towards people or other animals, is to be kept, it must be housed so as to minimise risk to staff and other animals."</p> <p>The original wording may be interpreted that aggressive animals must be housed, as opposed to how they must be housed.</p> <p>The RNZSPCA submits that the word 'quarantine' in example indicator point 3, be replaced with 'isolation'.</p> <p>The RNZSPCA submits example indicator point 5, be reworded to read- "Details of any health and behavioural issues and treatment, veterinary or otherwise, are identified on the animals record".</p> <p>The RNZSPCA submits that example indicator point 6 be removed as it is incorporated above.</p>	<p>Agree</p> <p>Disagree</p> <p>Disagree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>
4.1 Health Assessment on Admittance	12, 2	<p>Add to Example Indicators</p> <p>"Details of any behavioural issues that require particular attention in order to rehabilitate the animal to a point where it can be rehomed are identified on its record and conveyed to staff of the housing facility"</p>	<p>Too specific</p>

4.1 Health Assessment on Admittance	15	EI 4 - This could have a large financial and or, time implication, depending on the depth of the health check required, (eyes ears weight skin coat respiratory temperature capillary refill)also whether it is needed every time that same animal arrives(regular clients)owners generally do not bring sick animals to board unless there are special circumstances of which details would be given at the time. We feel for an in-depth welfare check of every animal on arrival even if it was only here last week is unreasonable. This could mean that we would require more trained staff to be able to cope and especially during our peak periods. This is not practical as qualified staff are not readily available for short periods of employment, and employing a full time Vet would cost far to much, and boarding fees would need to increase considerably .	Noted. This is an EI, not an MS
4.1 Health Assessment on Admittance	17	Isolation should be segregation - we submit that throughout this code isolation and quarantine are used interchangeable - this needs to be corrected. Isolation is used for the specific isolation of sick/unwell/diseased animals. Quarantine is the process of segregating animals who are not showing any clinical signs of disease while they are assessed. This document needs to set a standard of correct use of these terms. EI 5 - Details of any health <i>and behavioural</i> issues and treatment, <i>vet or otherwise</i> are documented on the animals record. We submit that both health and behavioural issues must be dealt with and recorded.	Agreed changed throughout Agreed
4.1 Health Assessment on Admittance	24	We recommend that minimum standard 5(b):‘Any incoming animal identified as requiring urgent veterinary treatment must be immediately referred back to the owner or receive prompt veterinary attention ‘be amended to: ‘Any incoming animal identified as requiring urgent veterinary treatment must be immediately referred back to the owner or receive prompt veterinary attention. If the owner is unavailable, unable or unwilling to take the animal to veterinary clinic, the person, business or organisation receiving the animal must take reasonable steps tonsure that the animal receives prompt veterinary attention.’ We recommend that minimum standard 5(c):‘Any incoming animal suspected of having an infectious disease must be isolated on arrival’ be amended to: ‘Any incoming animal suspected of having an infectious disease must be isolated on arrival and receive prompt diagnosis. The animal must only be isolated for the time reasonably necessary to diagnose its condition and to prevent the spread of any contagious diseases or infections.’	Legal issues around person in charge already covers this To wordy/specific
4.2 General Health	4, 17, 21, 28	MS (a) Preferably twice a day, morning and night. Animals can deteriorate quickly. RNZSPCA: At least once a day’ in Minimum Standard No. 6 (a) be changed to ‘at least twice a day by a suitably qualified or trained person and this information appropriately recorded’ be inserted,	Agreed, changed to ‘at least twice a day’
4.2 General Health	5	“There is evidence that staff are trained and possess the knowledge and competence to recognise ill health and injury in the relevant species and to undertake prompt action and treatment as necessary”. We believe that this statement should me moved to be included within the actual Minimum Standard itself. We suggest that this statement is weak and does not specify what or how many staff must possess knowledge and competence, what level that competence and knowledge must be at or how it is to be determined that they hold it.	Noted. Overly prescriptive See sections on competency and animal handling

4.2 General Health	12, 20, 22	<p>Change 'identify signs of' to 'ensure the'.</p> <p>Remove 'ill health and injury, and to maintain the health'.</p> <p>Minimum Standard 6a:</p> <p>Add another minimum standard reading: 'There must be evidence that staff are trained and possess the knowledge and competence to recognise ill-health and injury in the relevant species and to undertake prompt action and treatment as necessary'</p> <p>Add another minimum standard reading:</p> <p>Each temporary housing facility must have an arrangement with a veterinarian or veterinary clinic whereby a veterinarian is available on an emergency response 24-hour basis. An animal with a problem of a non-urgent nature should be seen by a veterinarian within 12 - 24 hours</p> <p>Example Indicators for Minimum Standard No. 6: Delete the first indicator.</p> <p>Recommended Best Practice: Delete c.</p>	<p>Disagree</p> <p>This is an EI</p> <p>Keep as RBP</p>
4.2 General Health	15	<p>MS 6(c) The issue that we see with this is that some people could see this as a cheaper opportunity for their animal to get groomed. This means that if an animal comes in and is not up to standard for its grooming then the carer becomes responsible for getting it to standard. I know for ourselves that we will be charging owners extra for these occurrences. Some clients may need to be turned away if time or cost is an issue.</p> <p>"Daily inspections and remedial outcomes are documented"</p> <p>This would seem logical if there were issues with each animal on a daily occurrence. However this is not the case. Within the work force for people, we do not check each person's health on a daily basis. We do however record through an incident book whenever an accident and/or incident does occur, or serious illness. This seems more practical to implement with in the boarding facility also.</p> <p>First aid kit</p> <p>We do think that a adequate first aid kit for animals is appropriate (with vet guidance as to the contents). However we do not agree that all staff should have to be trained in the 1st aid of the animals, as long as they are able to recognize if an animal is in need of distress or immediate attention and, that there is someone on site that is responsible and trained or experienced to deal with any injuries that may occur and or seek veterinary treatment as or if required.</p>	<p>Removed grooming MS but there is still an example indicator</p> <p>Noted</p> <p>Noted and changed</p>
4.2 General Health	17, 21, 28	<p>The RNZSPCA submits that the wording 'or be brought to the attention of an animal welfare inspector under the Act (e.g. an RNZSPCA inspector)' be removed from Minimum Standard No. 6 (b) to read – "...must urgently receive veterinary attention or, if required, be humanely euthanased in accordance with the Animal Welfare Act."</p> <p>We strongly believe this needs to be removed as it allows owners/persons in charge to absolve themselves of responsibility just by bringing the issue to the attention of an inspector. The RNZSPCA is adamantly opposed to the inclusion of this phrase in this or any other section of a code of welfare. The reasons for this are clear; any animal that is showing such signs of ill health, need to be seen</p>	<p>Re-worded</p>

		<p>by a veterinarian at the earliest opportunity in order to diagnose and / or treat that animal and relieve any unnecessary or unreasonable suffering.</p> <p>This is a legal requirement under the section 11 of the Animal Welfare Act 1999 and as such should not be transferable to another person by "bringing it to their attention".</p> <p>An operator of a temporary housing facility assumes the position of the person in charge of those animals in accepting those animals into their care, and as such must be expected to meet their obligations under the Act.</p>	
4.2 General Health	17, 21	<p>Introduction - Should be " Those responsible for the care of animals in temporary housing facilities have a responsibility to ensure the good health and welfare of animals in their care."</p> <p>we submit that it is not enough to "maintain" the health of the animals in care - many come in in negative health states - to maintain these would be to keep this negative situation the same</p> <p>Add: Each temporary housing facility must have an arrangement with a veterinarian or veterinary clinic whereby a veterinarian is available on an emergency response 24-hour basis. An animal with a problem of a non-urgent nature should be seen by a veterinarian within 12 - 24 hours of it being noticed - moved from recommended best practice to minimum standard. We submit that all temporary housing facilities needs to have this arrangement formally in place</p> <p>There is evidence that staff are trained and possess the knowledge and competence to recognise ill-health and injury in the relevant species and to undertake prompt action and treatment as necessary - moved from example indicator to minimum standard.</p>	<p>Disagree, not changed</p> <p>Disagree – keep as RBP</p> <p>An EI indicates what is expected from the MS's.</p>
4.2 General Health	21, 22	<p>EI: Add Animals must be groomed as appropriate to each species.</p>	Disagree
4.2 General Health	24	<p>We recommend that the following minimum standard, 6(a): 'Animals in a temporary housing facility must be visually assessed for signs of ill health or injury at least once a day.' be amended to: 'Animals in a temporary housing facility must be visually assessed (by suitably qualified or trained person for each species) for signs of ill health or injury at least once a day.'</p> <p>We recommend an amendment to minimum standard 6(b): '(b) Animals which are observed to be showing: (i) signs of pain, suffering or distress; or (ii) signs of continuous ill health; or (iii) signs of rapidly deteriorating health must urgently receive veterinary attention or be brought to the attention of an animal welfare inspector under the Act (e.g. an SPCA inspector) or, if required, be humanely euthanased in accordance with the Act.' Specifically, the words "or be brought to the attention of an animal welfare inspector under the Act (e.g. an SPCA inspector)" must be removed. This phrase is problematic as it shifts the burden of care from the person in charge to an inspector. Alternatively, if this phrase remains included, we recommend that the wording be reconsidered so that "bringing the animal to the attention" of an animal welfare inspector does not absolve the person in charge's responsibilities to mitigate any suffering.</p> <p>In relation to this minimum standard, we further recommend that the word 'continuous' be removed from minimum standard 6(b)(ii) below: ' (b) Animals which are observed to be showing: (i) signs of pain, suffering or distress; or (ii) signs of continuous ill health; (iii) signs of rapidly deteriorating health.'</p>	<p>Changed to twice a day</p> <p>Agree, re-worded</p> <p>Agreed, removed 'continuous'</p>

		<p>We further submit that the following recommendation for best practice, 6(c): 'Each temporary housing facility should have an arrangement with a veterinarian or veterinary clinic whereby a veterinarian is available on an emergency response 24- hour basis. An animal with a problem of a non-urgent nature should be seen by a veterinarian within 12 - 24 hours of it being noticed.' be amended in the following manner and incorporated as a minimum standard: 'Each temporary housing facility should have an arrangement with a veterinarian or veterinary clinic whereby a veterinarian is available on an emergency response 24- hour basis. An animal with a problem of a non-urgent nature should be seen by a veterinarian as soon as reasonably practicable and no later than 12 - 24 hours of it being noticed.'</p> <p>We further recommend that the following example indicators be incorporated as minimum standards: '[There is evidence that] staff are trained and possess the knowledge and competence to recognise ill-health and injury in the relevant species and to undertake prompt action and treatment as necessary.' 'No sick or injured animals are left untreated.'</p>	<p>Disagreed</p> <p>An EI indicates what is expected from the MS's.</p>
4.2 General Health	28	<p>The RNZSPCA submits that Recommended Best Practice (c) be removed as a recommended best practice and be made a minimum standard which reads – "Each temporary housing facility must have an arrangement with a veterinarian or veterinary clinic whereby a veterinarian is available on an emergency response 24-hour basis. An animal with a problem of a non-urgent nature should be seen by a veterinarian within 12 - 24 hours of it being noticed".</p> <p>We believe that all temporary housing facilities need to have a formal arrangement in place.</p>	Disagreed
4.3 Contagious Diseases	1	Kept in a separate isolation unit 'detached from the current enclosure'.	See section 7.6
4.3 Contagious Diseases	12, 20	<p>Minimum Standard 7a: Remove 'fully' 7b: Change certificates to "evidence". Change entering to "in".</p> <p>Delete: "stating clearly the full details of the veterinarian and the veterinary clinic including the veterinarian's signature."</p> <p>7e: Change 'isolated' to 'quarantined'.</p>	<p>7a – disagree</p> <p>7b – agree, but didn't change entering</p> <p>Disagree see section 7.6</p>
4.3 Contagious Diseases	17, 21, 22, 28, 24	<p>The word 'fully' should be removed from Minimum Standard No. 7 (a) (i). This is not possible in an animal welfare environment where the animals' history is unknown be kept in quarantine - we submit that isolation is not the correct use of terminology until their immune status has been established, if appropriate.</p> <p>Instead "vaccination evidence must accompany any animal in a temporary housing facility. We submit that in some circumstances original vaccination certificates may not be available. This wording change makes the minimum standard realistic.</p> <p><i>Evidence of vaccination</i> must show the date on which the vaccine was administered and the recommended date(s) for revaccination.</p>	<p>Disagree</p> <p>Agree, added</p>
4.3 Contagious Diseases	19	<p>Part 4.3: Contagious Diseases. I suggest a best practice is to design and develop accommodation and recreation areas to structurally compartmentalise the boarding population, limiting the contact between different playgroups to reduce the pre-symptomatic propagation and longevity of a disease outbreak (eg Canine Cough) within the boarding population.</p>	See EI 4

4.3 Contagious Diseases	28	<p>The RNZSPCA submits that the word 'isolation' in Minimum Standard No. 7 (a) (ii) be replaced with 'quarantine'.</p> <p>The RNZSPCA submits that the wording 'main part of the facility' in Example indicator point 2, be replaced with the wording 'facilities general population area' to read- "No animals in the facilities general population area show signs of contagious disease." The original wording is vague and this defines it further.</p> <p>The RNZSPCA submits that the word 'quarantine' in example indicator point 3, be replaced with the word 'isolation'.</p>	<p>Agreed</p> <p>Disagree</p> <p>Agree</p>
5 Providing for Behavioural Needs	1	<p>Example indicators for Min Standard No 8 -</p> <p>-Cats in communal catteries shall be given areas up high to reduce stress levels, and no less than 2 sq/mtrs per cat in communal catteries</p> <p>-Cats not be handled and placed in small boxes each day. This can spread disease, and will stress most cats which may result in bites or scratches to the carer.</p>	Disagree but see RBP (e)
5 Providing for Behavioural Needs	21, 22, 28, 12, 17,2 0	<p>Minimum standard changes:</p> <p>Species appropriate enrichment toys must be provided.</p> <p>Animals must be allowed daily exercise to maintain their health and well-being.</p>	<p>Toys – stays as RBP</p> <p>Exercise – stays as dogs</p>
5 Providing for Behavioural Needs	4, 17,2 1, 22, 28, 12, 20	<p>Electronic training devices must not be used.</p> <ul style="list-style-type: none"> - We submit that electronic training devices have no place in any temporary housing facility. The use of them is a negative punisher and this cannot be condoned. - Explain this? Why would they need to be used in an animal facility?? General Information, last sentence: Managing the behaviour, instead of correcting. It is not always easy to correct a behaviour that is learnt or otherwise. 	Electronic devices not banned; leave MS that requires consent of owner and RBP that they should not be used.
5 Providing for Behavioural Needs	1, 3, 11, 12, 17,2 0,21 , 22, 28	Animals must not be kept in shop windows.	This is RBP
5 Providing for Behavioural Needs	12, 20	<p>Delete: Example Indicator 8.</p> <p>Delete: Recommended Best Practice d.</p>	Disagree

5 Providing for Behavioural Needs	17	<p>(a) The original draft included sections with species specific housing guides/information. The latest draft has removed these as "too specific". There is no minimum standards doc available in nz for use as a guide for inspectors or as a statutory defence. In SPCA Waikato's view some minimum cage/enclosure sizes and requirements are necessary to provide a basic start point. Animals in temporary housing facilities must have sufficient space to socialise, rest, sleep, stand, stretch, swim, fly or move freely about (as appropriate to the species). We submit that this is too open to interpretation and causes resource to be expended finding expert opinion to prove the issue in cases of disagreement. We also submit that If this wording is left in place that "opportunity to engage in stimulating play and exercise" is included.</p> <p>(b) Add - "where an animal in communal housing exhibits signs of anorexia or gastric upset there must be an ability to segregate them to allow observation". We submit that while communal housing facilities are excellent for socialisation and fast re-homing they do not generally allow staff or PIC to identify individual animals who have these specific issues and remedy them quickly.</p>	<p>Disagree</p> <p>See quarantine and isolation standards</p>
5 Providing for Behavioural Needs	19	<p>Part 5: Providing for Behavioural needs. We have developed some outstanding recreational areas for dogs. In addition to sufficient space as per the minimum standard, considerable environmental enrichment can be attained by designing in different outlooks from the recreation areas. I strongly contrast this to the concrete bunker style of development that is tailored to maintaining constant temperatures and minimising staffing effort/cost, at the expense of a pleasant recreation environment for dogs.</p>	<p>Noted</p>
5 Providing for Behavioural Needs	24	<p>We submit that the best practice recommendation (b) be incorporated as a minimum standard: 'Adequate dry, clean bedding (preferably raised off the ground) should be used at all times'.</p> <p>We support the intention behind minimum standard 9(a). However, we note that at present, minimum standard 9(a) lacks any hard criteria, and only goes as far as requiring that housing systems and equipment be designed and built with the objective of creating an environment that does not injure the animals in question. A safe environment free from hazards should be a requirement, not a goal. We therefore recommend that the following example indicator be incorporated into minimum standard 9(a) as an element of that standard: - 'The design and construction of facilities allows animals to move around comfortably, without risk of injury.' We also recommend minimum standard 9(a) be amended to establish a clear process for eliminating hazards that may cause injury to animals. We therefore recommend this standard be re-drafted as follows: 'Housing systems should be designed to ensure that there are no hazards and no equipment upon which animals may injure themselves in areas to which they have access, and daily checks should occur to ensure that any new hazards are identified and eliminated and/or mitigated.'</p> <p>We also submit that the recommended best practice 9(e) be incorporated as a minimum standard: 'Emergency warning devices (including smoke alarms, fire detectors, fire extinguishers, emergency telephone numbers and exits) should be clearly marked and maintained.'</p> <p>We submit in relation to recommended best practice 8(a) that the words 'stereotypic behaviour' be removed. Adopting an ordinary interpretation of the phrase 'stereotypic behaviour', this is not a negative attribute that needs to be 'reduced'.</p>	<p>Agree, moved into MS</p> <p>See Housing</p> <p>See Contingency Planning section</p> <p>Disagree</p>

5 Providing for Behavioural Needs	26	<p>(f) Electronic training devices must only be used with the written consent of the owner and under the supervision of qualified and experienced persons and must not be used in a way that compromises the welfare of the animal.</p> <p>There should be a mandatory provision that if incessantly barking dogs cannot be quietened by other means they should either be placed in a sound-proof kennel or be fitted with a bark collar.</p>	Disagree
5 Providing for Behavioural Needs	28	<p>The RNZSPCA submits that further information needs to be included around appropriate pen/cage sizes as per 'sufficient space', referred to in Minimum standard No. 8 (a).</p> <p>We have included in Appendix B of this submission, pen/cage size requirements as per the RSPCA Australia position paper adopted in 2012 - 'Operation of RSPCA Shelters' which we believe should be incorporated.</p> <p>The RNZSPCA submits that more thought needs to be given to Example indicator point 1 and what defines 'normal behaviours' - this is vague and open to interpretation.</p> <p>The RNZSPCA submits that Recommended Best Practice (a) be removed as a recommended best practice and be inserted as a minimum standard which reads – "Accommodation must aim to promote normal behaviour and to reduce boredom, aggression and stereotypic behaviour."</p> <p>The RNZSPCA submits that that Recommended Best Practice (d) be removed as a recommended best practice and be inserted as a minimum standard with the revised wording- "Species-appropriate behavioural enrichment must be provided". We believe this is important as it is necessary for the welfare of animals in temporary housing facilities, particularly for long-term stays.</p>	<p>Disagree</p> <p>Noted</p> <p>Disagree</p> <p>Keep as RBPs</p>
6.1 Housing Design and Construction	1	<p>Pest control - no bait to be used. Only humane traps be used. Secondary poisoning kills just as easy as primary poisoning.</p> <p>Example indicators -</p> <ul style="list-style-type: none"> -Animals be examined at ease with minimal or no handling to reduce stress -Owner or carer MUST be on site 24/7 incase of emergencies. I know of boarding cattery owners who dont live on site and this poses a huge risk if there be a fire. 	<p>Pest control moved to general facility management; hygiene mentions secondary poisoning; traps covered by Act</p> <p>Agree added to new section on contingency planning</p>
6.1 Housing Design and Construction	17	<p>Sufficient perches of varying diameter, roosting areas, and feed and water stations <i>must</i> be provided to meet the needs of all the birds in a cage or aviary.</p> <p>EI 6 Environmental parameters of the housing system are in accordance with the minimum standards for Lighting, <i>air and water quality</i>, and Temperature</p> <p>RBP (c) This item should be moved to "7.5 Quarantine and Isolation Management. We submit that this item is neither appropriate nor necessary for a non-isolation kennel space. In fact healthy, behaviourally assessed social animals such as dogs SHOULD have physical and visual interaction to minimise social isolation.</p>	<p>Agree, under behavioural needs</p> <p>Agree</p> <p>Agree, changed</p>
6.1 Housing Design and Construction	2	<p>"6.2 Housing Size</p> <p>Introduction</p>	<p>Added to intro.</p>

		<p>The size of each holding area or cage must be sufficient to allow the good health and well-being of the animals. Each animal species held within the facility has special needs and requirements that must be taken into account when placing an animal into a particular holding area or cage.</p> <p>Minimum Standard No. 10 Housing and Cage Size</p> <p>(a) Each holding area and cage must be of sufficient size to allow for the good health and well-being of the animals as appropriate to the species.</p> <p>(b) No animal must be held in a cage for more than twelve hours, following which it must be allowed into a larger holding area for a similar twelve hour period.</p> <p>Example Indicators for Minimum Standard No. 10 – Housing and Cage Size</p> <ul style="list-style-type: none"> • The size of each holding area must allow animals to move around freely and behave naturally • The size of each holding cage must allow animals to stand and turn around freely. It must include sufficient space for bedding, food and water bowls, and a litter tray” 	<p>Disagree – quarantine, isolation?</p> <p>Agree, behavioural needs</p>
6.1 Housing Design and Construction	12, 20, 21, 22, 28	<p>Minimum Standard No. 9 (h) Change should to “must”.</p> <p>Example Indicator No. 6: the section title ‘Ventilation’ in example indicator point 6 should read ‘Environmental Air and Water Quality’ as per section 7.3.</p>	<p>MS 9h moved to behavioural section</p> <p>Agreed and moved to facility management</p>
6.1 Housing Design and Construction	12, 20, 21, 22,	<p>Add EI: Approved recognized disinfectants that are safe for people and animal used.</p> <p>We note that there is no detailed housing information regarding specific species and I strongly recommend that such information should be included in this code as Recommended Best Practices. Full details for the following species were contained in the original submission from the New Zealand Companion Animal Council, including:</p> <p>Dogs (6.4)</p> <p>Cats (6.5)</p> <p>Birds (6.6)</p> <p>Chinchillas (6.7)</p> <p>Fish (6.8)</p> <p>Reptiles (6.9)</p> <p>Remove RBP (b) and (c).</p> <p>Change (f) to: Emergency evacuation procedures and management procedures should be in writing and available to all staff and persons in charge.</p>	<p>Agree but under Hygiene</p> <p>Disagree</p> <p>Contingency planning has new section</p>

6.1 Housing Design and Construction	28	<p>The RNZSPCA submits that Recommended Best Practice (b) be removed.</p> <p>This is covered by Minimum Standard No. 8 (d).</p> <p>The RNZSPCA submits that Recommended Best Practice (f) be removed.</p> <p>The RNZSPCA submits that Recommended Best Practice (c) be removed as a recommended best practice and become a minimum standard under Minimum Standard No. 14 – Quarantine/Isolation Management, to read – “Kennels must be separated by solid partitions (walls) or solid and wire dividers (walls with wire dividers), and must be constructed so that the animals cannot have physical or visual contact with each other”.</p> <p>We believe that this practice is neither appropriate nor necessary for a non-isolation kennel space. In fact healthy, behaviourally assessed, social animals such as dogs should have physical and visual interaction to minimise social isolation.</p>	<p>Disagree</p> <p>Moved to emergency management</p> <p>Agree</p>
6.1 Housing Design and Construction	17, 21, 22	<p>Housing systems must be sited to facilitate drainage of storm water <i>in a separate area</i> from buildings and to minimise risks posed by natural and environmental hazards.</p>	<p>Noted, MS 8d</p>
6.1 Housing Design and Construction	12, 20, 2	<p>Minimum Standard No. 9/ Recommended Best Practice Move Recommended Best Practice (d) into Minimum Standard No. 9. Therefore, Minimum Standard (i) reads:</p> <p>“All outside entrances must be double-door “mantraps.””</p> <p>and thereby add to Example Indicators</p> <ul style="list-style-type: none"> • “Double-door “mantraps” entail having sufficient space between the doors, allowing one door to be closed behind the person entering or departing before the next door is opened, thereby preventing animals from escaping.” <p>Example Indicators for Minimum Standard No. 10 – Housing and Cage Size</p> <ul style="list-style-type: none"> • The size of each holding area must allow animals to move around freely and behave naturally • The size of each holding cage must allow animals to stand and turn around freely. It must include sufficient space for bedding, food and water bowls, and a litter tray” 	<p>Disagree, kept as RBP</p> <p>See first EI and behavioural section</p>
6.1 Housing Design and Construction	4	<p>Example Indicators MS 9: An observation window is a useful addition to a facility, allowing quiet observation with no disturbance. Animals can be monitored from a distance.</p>	<p>Noted</p>
6.1 Housing Design and Construction	3	<p>Design and Construction.</p> <p>I think that contacting the local authority (councils) is a waste of time I think this needs to be done by AsureQuality who run some of the boarding establishments already and have good codes to go by. I do think that Communal catteries need to be abolished. The UK banned these in the 60's. They just provide a lot of stress for the shy animal who just hides away. I also think that there should be a</p>	<p>Noted</p>

		<p>minimum room size for cats. I put forward a minimum of 1.3 meters wide x 2 metres deep and 1.8 metres high with at least 1 shelf. This would accommodate for the larger breeds of cat.</p> <p>Add to Best Practice.</p> <p>A recognised and approved disinfectant be used that is safe for <u>people and pets</u>. Some disinfectants today do not require rinsing off.</p>	<p>Noted: maintenance, not construction.</p>
6.1 Housing Design and Construction	15	<p>RBP c - This recommendation seems to conflict with itself. By having any sort of wire divider between the kennels means that the animals could have physical or visual contact with each other. If solid walls were implemented all the way around the kennel so visual contact was not able to be made then there would become an issue of natural light being available to the animals. This could also impede on ventilation for the likes of dogs and then the kennel and dog could start to omit odours which is not healthy for the animal.</p>	<p>Noted. Good point re – ventilation</p>
7 Facility Management	28	<p>We have identified a number of important points that we believe have not been included in this draft Code. The RNZSPCA submits that a new section be added under Part 7 – Facility Management as below:</p> <p>General</p> <p>Minimum Standard No. xx – General Facility Management</p> <p>a) To ensure animals are sufficiently identifiable, a unique identifier must be established for every incoming animal.</p> <p>b) Animal handling must be appropriate to the species and individual.</p> <p>c) Every temporary housing facility must determine what their maximum capacity is and must not exceed this.</p> <p>d) Unattended ‘drop boxes/amnesty boxes’ must not be used.</p> <p>e) Staff and volunteers must have access to information on the potential zoonotic diseases they may be exposed to.</p> <p>Example indicators for Minimum Standard No. xx – General Facility Management</p> <p>Identification is physically attached to animals for the duration of their stay, unless this poses a safety risk to animals and/or staff.</p> <p>The facilities population is managed and its capacity is not exceeded.</p> <p>Staff and volunteers are aware of the potential risks surrounding zoonotic diseases and have an understanding of the transmission, signs and symptoms, diagnosis and treatment.</p> <p>Explanation</p> <p>a. Minimum Standard No. xx (c) - The maximum capacity must be based on how many animals can be held according to the requirements outlined in Part 6 of the code of welfare. It may be necessary to maintain the facility at a lower occupancy than maximum capacity to prevent constraints on resources and ability to care.</p>	<p>Incorporated into general facility management.</p>

		<p>b. Minimum Standard No. xx (d) – The RNZSPCA strongly believes this needs to be included. The continued and antiquated use of Animal Drop Boxes in animal facilities is not conducive with any of the goals or principles that we as a 21st century animal welfare organisation are striving for.</p> <p>Points to note on the use of Animal Drop Boxes:</p> <p>These implicitly approve of the disposable nature of animals</p> <p>Their use may in fact not meet the needs of Section 141 or 142 under the Animal Welfare Act 1999 and may create situations whereby RNZSPCA Centres are in breach of the Act.</p> <p>They diminish the chance of reclaims and the reuniting of lost animals</p> <p>They can encourage the theft of 'nuisance' animals</p>	
7.1 Temperature	1	<p>Temperature</p> <p>(b) A thermometer must be installed and placed at a level the animal is resting to ensure they are warm. Not at a level well above them.</p> <p>Lighting</p> <p>(c) Lighting should be on 24/7, dimmed at night. Contrary to popular belief, some animals can not see in total darkness.</p>	<p>MS modified.</p> <p>Disagree</p>
7.1 Temperature	4	Example Indicators: Add Staff are sufficiently trained to be able to recognise thermal (heat stroke) stress in all species.	Agreed, added
7.1 Temperature	12, 20, 21, 22, 28	Minimum Standard 10C: Change 'too cold or too hot' to 'discomfort due to excessive temperature conditions'.	Changed
7.1 Temperature	19	<p>Referring to Part 7.1: Temperature, I suggest the example indicator “No animals show signs of thermal stress” is unachievable in the context of boarding dogs.</p> <p>A facility designed to never observe any thermal stress in any dog at any time would require a fully enclosed and heated accommodation building, with limited enclosed and heated area of playspace to be heavily shared, infringing on a best practice pleasant environment for dogs to recreate.</p> <p>From local veterinary reports, the poorest performing facility for health outcomes in the Wellington region was the most enclosed and draft proofed accommodation building.</p> <p>Our new facilities we are working towards will be more enclosed, insulated and heated in line with our personal aspirations – at a cost of around \$500,000, which is a solid decade from our current position. To require this level of facility upgrade overnight would collapse a large number of boarding facilities outright.</p> <p>Consider modifying or removing the example indicator “no animals show signs of thermal stress”, as the remaining example indicator for “corrective action is taken” should sufficiently cover this safety, comfort and health aspect in the context of boarding dogs.</p>	Noted, EI's changed

7.1 Temperature	24	We recommend that a process of performing visual checks several times throughout the day during seasons of extreme temperatures (Winter and Summer season) be included as an example indicator. This would not require an overly comprehensive examination, but rather several quick visual inspections of the animals throughout the day depending on how extreme the temperatures are, if there is no temperature regulation inside the facility.	Agreed, added
7.2 Lighting	12, 20, 21, 22, 28	Minimum Standard 11c: Must, not should.	Changed
7.2 Lighting	24	'Animals must be provided with natural or artificial light of appropriate intensity for a duration appropriate for their species' be amended to incorporate the recommended best practice (a) so that it reads: 'Animals must be provided with natural or artificial light of appropriate intensity for a duration appropriate for their species. The duration and intensity of internal lighting should be as close as possible to natural conditions.'	Left as appropriate for their species
7.3 Air and Water Quality	5, 17, 12, 20, 21, 22	(b) For aquatic species. (i) We STRONGLY suggest that the reference to “goldfish bowls” be removed entirely from this (and any other) paragraph. Goldfish bowls represent a strong although culturally entrenched threat to the welfare of any fish kept in them. Most stores in New Zealand and indeed in many western countries already voluntarily refuse to sell goldfish bowls on the grounds that they are cruel to the fish. Some countries (notably Italy) have placed a legal ban on the sale of goldfish bowls and others are considering similar moves. It sends altogether the wrong message to even have this term included anywhere at all within this code.	Agreed
7.3 Air and Water Quality	11	Environmental Air and Water Quality Minimum Standard No.12 - Air and Water Quality PIA recommends clarification is given on how to measure ammonia levels of 20ppm. PIA recommends the following be included as Recommended Best Practice - For all aquatic fish, each 2.5cm of fish require 2.5 litres of water. Fish bowls should not be recommended.	Noted. Shouldn't have to describe every procedure. Fish bowls removed.
7.3 Air and Water Quality	12, 20, 21, 22, 28	Minimum Standard 12 (a) (ii): Remove 'if ammonia levels greater than 20 ppm are detected at animal level, or'. Recommended Best Practice a) i): Remove 'such as ammonia levels'.	Removed Removed

7.3 Air and Water Quality	13	<p>On page 20 of the document, Minimum Standard #12 specifies that "All aquariums must have a water volume of 4 litres or greater, regardless of the species or number of fish kept in them". While we applaud the idea of minimum standards for fish in terms of heating, filtration and water quality, we ask that the minimum tank size specification be reviewed. A 4 litre aquarium is too small for the majority of fish and could constitute cruelty if used to house larger fish, such as goldfish, plecostomus or cichlids. However, this tank size is larger than that required for the humane temporary housing of Betta (aka Siamese Fighter) fish. As such, this minimum tank size will have the effect only of increasing the space required to house Bettas (of very questionable benefit) while having no impact whatsoever on those retailers who are currently overcrowding sale tanks and/or keeping large fish in undersized tanks.</p> <p>Due to their unusually aggressive nature when housed together, male Betta fish must be housed in individual enclosures. In Animates stores this is achieved through the use of specially designed Betta aquariums, where each fish is housed in an individual one-litre unit, with all of the units being connected to a larger sump filtration system.</p> <p>The Bettas coming into stores have been kept in small spaces for their entire lives and the 1-litre cubes represent an upsize from the spaces they have been kept in prior to this point. We then suggest that customers house their Betta in a larger aquarium (8 litres or larger), with a filter and heater. This is not a concern for our instore systems as the individual units are connected to a larger sump, allowing for good filtration and properly cycled water.</p> <p>The instore Betta tanks represent a large investment for Animates as these have been specifically designed for our stores in New Zealand and Australia, to provide a humane and effective housing option for a number of male Bettas at once. We are currently rolling out these units across all 26 Animates stores, so the inability to use them will result in a loss of tens of thousands of dollars. More importantly, it also means that we will be left with less-effective, less-practical and arguable less-humane methods of housing Bettas as we will no longer have units designed for their specific needs.</p> <p>We ask that the minimum tank size requirement in the code be modified such that Bettas are excluded from the four-litre requirement; or that the requirement is changed from a minimum standard to a best practice recommendation only.</p>	Reviewed MS. Re-worded
7.3 Air and Water Quality	25	<p>I am a tropical fish importer and after reading the Code of welfare for temporary housing for companion animals I have come across that all aquariums must have a volume of 4 litres or greater ,regardless of species or number of fish kept in them.(Minimum standard No12 –air and water quality) The problem I have with this is we import Male Betta Splendens (male fighters) if kept in a tank together they will fight to the death . To keep the separate in quarantine they are on a board in a container in 100mls of water with a water change daily (80 fish per board),once they come out of quarantine they are put into a system with separate containers with 3 litres of water (per fish) The fish arrive to us in 100mls of water and are fine.</p>	Reviewed MS. Re-worded
7.3 Air and Water Quality	27	<p>I just wanted to let you know that there are concerns regarding the minimum of 4L per fish tank.</p> <p>Commonly, Siamese fighter fish are individually housed in small tanks while in quarantine to avoid fighting with other fish (also a welfare issue). The fish seem to do well health-wise.</p> <p>Is the minimum tank size due to water quality issues, or is the issue the restricted space?</p>	Reviewed MS. Re-worded

7.3 Air and Water Quality	28	The RNZSPCA submits that the word 'should' be replaced with 'must' in Minimum Standard No. 12 (b) (iii).	Agreed, changed
7.3 Air and Water Quality	17	Immediate remedial action must be taken if <i>noxious odours</i> - we submit that ammonia is too specific - are detected <i>anywhere in the housing facility</i>	Agreed, changed
7.4 Hygiene	1	Recommended best practice (REMOVE) (Rodent poisons) should be used with extreme caution. (they should NOT be used at all. Humane traps used instead)	Removed
7.4 Hygiene	4, 15	Introduction In the 3 rd sentence of the Introduction there is the word 'Weak' missing	Updated
7.4 Hygiene	4	Last sentence - You need to include the cat in this as well. Cats are also extremely sensitive to chemical smells and disinfectant. MS 13: (c) I feel this should be a least twice a day. Kittens especially mess in their litter trays more than once a day.	Code is referring to respiratory problems not just sensitive At least once a day
7.4 Hygiene	2, 12, 20, 21, 22, 28	Minimum Standard 13 (a): Add: Appropriate to the species. Recommended Best Practice Add to (d) "and the number of animals being housed." [RNZSPCA:] We however feel this point is meaningless given there is no indication as to what 'sufficient numbers' are i.e. 1x litter tray to every 2 animals.	Noted Agreed, added
7.5 Quarantine	1	Suitable quarantine/Isolation facilities must be in a sperate building to other animals, and concideration should be placed on prevailing wind and cross contamination between the buildings. Best practice: (Remove) (a) 10% of the carrying capacity ... should be suitableand be avilable at all times. (remove) It is not good practice to have sick animals mixing in any enclosure with healthy animals. (d) remove)	Agreed
7.5 Quarantine	12, 20, 21, 22	7.5 Introduction: Change 'to promote' to 'to allow assessment as well as ensure adequate' . Remove 'isolation'. Change 'is' to 'may be'. Minimum Standard No. 14 Should be: 'Quarantine and Isolation' Delete quarantine from the Minimum Standard. Add a new Minimum Standard: Enclosures must be separated by solid partitions (walls) or solid and wire dividers (walls with wire dividers), and must be constructed so that the animals cannot have physical or visual contact with each other. Recommended Best Practice: Add: Quarantine facilitates to allow assessment of animal health and behaviour of incoming animals should be provided'.	Agreed – section re-worded RBP

		<p>b) quarantine “or” isolation.....</p> <p>Delete: “building” and “buildings”.</p> <p>d) This should read 'quarantine and isolation areas'.</p> <p>e) This should read 'quarantine and isolation areas'.</p> <p>f) delete quarantine [twice]</p> <p>g) Change last phrase to read: “footware kept in both the quarantine and isolation areas”.</p>	
7.5 Quarantine	17	<p>We submit that isolation and quarantine are quite different items. A quarantine "is used to separate and restrict the movement of well persons who may have been exposed to a communicable disease to see if they become ill." [1] The term is often erroneously used synonymously with isolation, which is "to separate ill persons who have a communicable disease from those who are healthy." In animal facilities quarantine is also used to assess behaviour. This document is a national standards document and should set the standard for correct terminology</p> <p>RBPs</p> <p>Quarantine facilities are available to allow assessment of health and behaviour of incoming animals - we submit that while isoaltion facility access is necessary and must be a minimum standard the provision of quarantine facility is recommended only</p> <p>Suitable overgarments and footwear should be available at entry/exit points, and should be worn while inside the isolation area. We submit that barrier nursing techniques are not always necessary, nor desirable in the quarantine area.</p>	Agreed – section re-worded
7.5 Quarantine	24	<p>We recommend that in addition to having appropriate facilities available in the event of suspected contagious diseases, facilities should also have a recognised procedure in place to deal with these incidents, and that this requirement should be included in the minimum standards. A contagious diseases procedure should go as far as detailing a protocol for controlling significant outbreaks of diseases or where there is an epidemic, and the facility should anticipate how they will accommodate for such events in terms of resources. Procedures detailing this could be included as a best practice recommendation or as an example indicator.</p>	Agreed – see quality assurance
7.5 Quarantine	28	<p>The RNZSPCA submits that section 7.5 be renamed to “Quarantine and Isolation Management”.</p> <p>The RNZSPCA submits that the below amendments be made to the introduction paragraph:</p> <p>The word ‘promote’ be replaced with the words ‘allow for assessment, as well as adequate’,</p> <p>The word ‘isolation’ be removed,</p> <p>The word ‘is’ be replaced with ‘may be’</p>	Agreed - section re-worded

	<p>To read- "Maintenance of the health of animals in a temporary housing facility requires a policy to limit the importation and spread of disease. To avoid injury and to allow for assessment, as well as adequate disease control, segregation of incoming animals for a period of time may be necessary".</p> <p>The RNZSPCA submits that the below amendments be made to Minimum Standard No. 15:</p> <p>The word 'quarantine' is removed,</p> <p>The word 'immediately' is removed,</p> <p>The words 'suspected of' is replaced with 'is found to be'</p> <p>To read- "Suitable isolation facilities must be available, and must be used when any animal is found to be carrying a contagious disease".</p> <p>The RNZSPCA submits that the 'Example Indicator' title is altered to reflect the changes to the minimum standard heading.</p> <p>The RNZSPCA submits the following changes are made to Example Indicator, point 1:</p> <p>The wording 'suspected of' be removed,</p> <p>The wording 'this may include the use of foster homes' be included,</p> <p>To read – "A facility is available which will adequately isolate animals known to be carrying an infectious disease from healthy animals; this may include the use of foster homes".</p> <p>The RNZSPCA submits that a new recommended best practice be included as below- "Quarantine facilities should be provided to allow for assessment of health and behaviour of incoming animals".</p> <p>The RNZSPCA believes that while isolation facility access is necessary and must be a minimum standard, the provision of quarantine facility is recommended only.</p> <p>The RNZSPCA submits that the wording 'quarantine/isolation' be replaced with 'quarantine and isolation' in Recommended Best Practice (b)</p> <p>The RNZSPCA submits that the wording 'quarantine/isolation' be replaced with 'quarantine and isolation' in Recommended Best Practice (b).</p> <p>The RNZSPCA submits that the wording 'quarantine/isolation' be replaced with 'quarantine and isolation' in Recommended Best Practice (c).</p> <p>The RNZSPCA submits that the wording 'quarantine/isolation' be replaced with 'quarantine and isolation' in Recommended Best Practice (d).</p> <p>The RNZSPCA submits that the word 'quarantine' be removed in Recommended Best Practice (e).</p> <p>The RNZSPCA submits that the word 'quarantine' be removed in Recommended Best Practice (f).</p>	
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		The RNZSPCA submits that the wording 'quarantine/isolation' be replaced with 'quarantine and isolation' in Recommended Best Practice (g).	
8 Sale or Rehoming	1	(e) (REMOVE)... except under circumstances where the mother is unable to provide the necessary care..... Reason being many people are using this as an excuse to rehome kittens and puppies well under 8 weeks. I have seen this happen on trademe many times. Example Indicators for Min standard No 15 (REMOVE) 'Except in the circumstances detailed above'. My reason are explained above. Too many people using excuses the mother died, just so they can rehome underage. This also should be removed from the Companion Cat Code (2007)	Noted but there should be a provision for this circumstance
8 Sale or Rehoming	5	f) Insert an additional sentence noting that the sale or rehoming of pregnant (or gravid) fish and aggressive fish is exempt from this clause. In many species of fish it is difficult or impossible to know when they are gravid and in some they are in this state permanently (e.g. livebearers). Additionally the moving of "expectant" fish does little or no harm provided normal transport procedures are undertaken.	Agreed
8 Sale or Rehoming	7, 9	We recommend in i) Dogs must be microchipped prior to sale or rehoming, that the addition of the words "and the microchip be registered". Further to this you could add WHERE the chip should be registered i.e. NDD and/or (preferably AND) NZCAR In our core business as the nationwide database for lost and found pets, we find many dogs (and cats) are microchipped, yet their microchip numbers are not registered onto any database, rendering the chip essentially useless... Further, animals who are chipped and are still awaiting adoption or sale, should be temporarily registered to the shelter, pet shop, pound etc that they are in and upon adoption/sale those details should be changed over to the new owner within a short period of time (within 48 hours of sale/adoption?). We VERY STRONGLY SUPPORT Minimum standard 15 (Sale or Rehoming (h) re: Compulsory Desexing However, we suggest the amendment of (h) that the AGE for cats (kittens) and dogs (pups) be stated much more clearly as is this freely open to interpretation (therefore avoidance) at present. Example indicators of age should be added which are conducive with <u>EARLY</u> desexing	Disagree- this is covered under the Dog Control Act; cats covered under RBP Noted Veterinary advice
8 Sale or Rehoming	8	I support the desexing of all pets/animals being rehomed from shelters. As there are enough unwanted pets/animals already.	Noted
8 Sale or Rehoming	3	Minimum Standards No. 15 – Sale or Rehoming (e) Young animals must be fully independent prior to sale or rehoming except under circumstances where the mother is unable to provide the necessary care and specific provisions have been made for a competent person to provide full care for nutritionally dependent young. These to be assessed by a vet before rehoming.	Noted but vet assessment not added

		Animals are not returned to the facility because of health, temperament or behavioural problems should read: Animals must not be returned	RBP
8 Sale or Rehoming	2	<p>Minimum Standard No. 15 (change to 16)</p> <p>(h) Add “or foster home” after welfare centre. Delete “routine” and replace with “surgically possible.”</p> <p>Example Indicators.... Delete “of sick, injured or diseased animals.” Animals with any of these conditions must not be sold or rehomed. Appropriate veterinary treatment must be given to resolve the sickness, injury or disease before any animal is sold or rehomed.</p>	<p>Foster homes not covered under this Code</p> <p>Added where surgically possible</p> <p>Noted, not deleted</p>
8 Sale or Rehoming	10	I work in a very poor economic town . unfortunately the people have pets and do not have them desexed claiming they do not have the funds. I feel all pets should be desexed , and it should be made compulsory to avoid the many unwanted pets that arrive at shelters. This is such an easy fix. The amount of money and man hours that are wasted caring for these animals, that did not have to be born in the first place is huge. This money could go into other projects such as schools and hospitals.... Do you right thing and make desexing compulsory.	Noted
8 Sale or Rehoming	11, 2, 3, 12, 20, 21, 17,2 2, 28	<p>Minimum Standard No.15 - Sale or Rehoming</p> <p>(i) Dogs must be microchipped prior to sale or rehoming.</p> <p>Add the words <i>and on the database</i> to (i) and adding (h) <i>Cats must be microchipped and on the database prior to sale or rehoming.</i></p>	Dogs covered by Dog Control Act, MS removed; but cats as an RBP
8 Sale or Rehoming	12, 20, 2	<p>(a) Delete “without full disclosure to and acceptance by the new owner.”</p> <p>Recommended Best Practice Move a, d, and e to Minimum Standards. Also move f to Minimum Standards apart from pregnant. Delete Recommended Best Practice b). Therefore Recommended Best Practice will be c, and f, with the latter reading “Animals that are pregnant should not be made available for sale or rehoming.” Also “should” in each Recommended Best Practice must thereby be changed to “must”.</p> <p>Add “microchip” after parasite treatment in the penultimate example.</p>	<p>Disagree</p> <p>Noted and made appropriate changes</p>
8 Sale or Rehoming	12, 20, 21, 22, 28	<p>Minimum Standard No.</p> <p>(e) add: 'and must be assessed by a veterinarian before rehoming'.</p> <p>(f) Add: 'to the new owner'.</p> <p>(h) Change ' pound or animal welfare centre' to 'temporary housing facility' . Delete “routine” and replace with “surgically possible.”.</p>	<p>Disagree</p> <p>Added surgically possible</p>

		<p>Add Minimum Standard (j): Dogs must be registered prior to rehoming.</p> <p>Add Minimum Standard (k): New owners must be provided with literature on the required care of the animal to include feeding, parasite control, health (including emergency procedures, housing and responsible ownership) including legislation existing for companion animals.</p>	<p>Dog Control Act – removed microchip MS</p> <p>RBP</p>
8 Sale or Rehoming	15 identical submissions	<p>I strongly support the proposed minimum standard 15 (h): "All animals being sold or rehomed from a pound or animal welfare centre must be desexed if they are of a species and an age for which such procedures are routine."</p> <p>In addition I suggest the following amendment: "All impounded dogs must be desexed before being released back to owners"</p> <p>There is a huge problem in NZ with thousands of companion animals being killed every year as there are not enough homes for all of them.</p> <p>Dogs and cats are allowed to breed with little thought of what will happen to the offspring, pups and kittens are given away, or sold cheaply to homes which are not able to afford registration fees or appropriate vaccinations and vet care.</p> <p>Animals which end up in the pound or animal welfare centre can easily be fixed to prevent them contributing to the problem in the future.</p> <p>Desexing is the only way to reduce our shocking euthanasia statistics.</p>	<p>Agreed, but modified slightly RBP now reads: "or have an arrangement in place to ensure desexing".</p>
8 Sale or Rehoming	28, 17, 2	<p>15h should read: "All animals being sold or rehomed from a temporary housing facility must be desexed, or have an arrangement in place to ensure desexing, if they are of a species and an age for which such procedures are routine, or where surgical procedure is possible".</p> <p>The RNZSPCA submits that Recommended Best Practice (b) be removed and included as a minimum standard. We believe that by making this a minimum standard, a better level of owner education will occur.</p> <p>The RNZSPCA submits that the wording 'Example indicators for Minimum Standard No. 15 – Sale or rehoming of sick, injured or diseased animals' be changed to include the amended title of the minimum standard, 'Example indicators for Minimum Standard No. 15 – Sale or rehoming'.</p> <p>The RNZSPCA submits that the following should be included in Part 8 of the Code- "Where animals are being sold, the Consumer Guarantees Act 1993 and the Fair Trading Act 1986 apply".</p>	<p>Noted</p> <p>Agreed and changed</p> <p>Agreed and included</p>
8 Sale or Rehoming	21, 22	<p>Recommended Best Practice (f) the words 'antisocial or pregnant, and animals with known vices such as excessive barking or fence jumping (dogs)' be removed from Recommended Best Practice (e), to read- "Animals that are aggressive should not be made available for sale or rehoming".</p>	<p>Agreed, changed</p>

		We believe that the intention of this item is negative and that these animals (specifically pregnant, anti-social or fence jumping) are equally deserving of responsible, informed new homes. Care must also be taken when labelling any animal "aggressive" that the person giving the label has the appropriate skill and experience to do so.	
8 Sale or Rehoming	24	<p>We submit that the best practice recommendation 15(a) be incorporated into a minimum standard in order to promote a culture of responsible and informed pet ownership: 'New owners should be given appropriate literature on the care of the animal for example on feeding, desexing, parasite control, health (including procedures for emergency treatment), housing, and responsible companion animal ownership including current legislation covering the registration of companion animals.'</p> <p>We do not support the inclusion of minimum standard 15 (f), requiring that 'Animals for which vaccination is possible must be partially or fully vaccinated prior to sale or rehoming, with appropriate certification provided'. This standard is likely to be very burdensome on animal shelters and re-homing organisations with fewer resources. For instance, adult dog full vaccinations usually cost over \$200 per animal. It may therefore discourage individuals from housing stray animals, for instance, as they will be required to vaccinate the animal before handing it over to a new owner. It is unlikely that this negative impact would be outweighed by the benefits of the animal being immune to certain diseases. We therefore submit that this standard be incorporated as a recommended best practice, and incorporated into quality assurance regimes for larger animal establishments such as pet shops, rather than as a minimum standard for all organisations and individuals falling within the jurisdiction of the Code.</p> <p>We submit that the recommended best practice 15(d) be included as a minimum standard: 'Animals should not be released for sale or rehoming if there is any doubt about the ability of the potential owner to care for them appropriately.'</p> <p>We support the inclusion of a facility policy as an example indicator that outlines criteria against which the suitability of new owners is assessed. Affording discretion to the caregivers of a facility is sensible, as assessments should be made holistically on a case-by-case basis. We further support the inclusion of a minimum age within this policy, as caring for an animal requires a mature person who has sufficient resources to care for them.</p> <p>We also recommend the inclusion of a declaration to be signed by new owners acknowledging their decision to take ownership of a new animal, and that also familiarises them with their responsibilities under the Act. This requirement could be incorporated as an example indicator or a best practice recommendation.</p>	<p>Kept as RBP</p> <p>RBP only</p> <p>Noted, changed to MS</p> <p>Noted, minimum age not included under e</p> <p>Noted, not within scope of CoW</p>
10 Euthanasia	4	Suffering should be 'suffered'	Agreed, changed
10 Euthanasia	12, 20, 21, 22, 28, 17	<p>Minimum Standard 16 (a): Add "and painless" after rapid.</p> <p>Minimum Standard 16 (b): Add "gassing".</p> <p>Second Example Indicator: Change this to read: 'If an animal has died or is euthanased whilst in the facility the procedures and findings following necropsy should be available and held for a minimum of one year after the event.'</p> <p>Recommended Best Practice b): Change must to "should".</p> <p>General Information: Delete: (e.g. an SPCA inspector or auxiliary officer)</p>	<p>Added 'minimal pain'.</p> <p>Kept to drowning or freezing.</p> <p>Gassing a perception issue</p> <p>Agreed</p> <p>Agreed</p> <p>Deleted</p>

10 Euthanasia	17	<p>Euthanasia in temporarily housed animals may be necessary where treatment to restore the health of an animal is impractical or unsuccessful, or where rehoming is inappropriate. We submit that this be removed entirely. Legislation has in fact been passed in many US states requiring animal welfare and rescue agencies to seek positive alternatives when efforts to re-home have been unsuccessful. By specifying this line in a code we submit that it legitimises the lack of effort too many temporary housing facilities put into finding positive outcomes, instead this document should promote a change of behaviour - any animal taken into care/custody has had a commitment made which should be followed through to a positive outcome.</p> <p>Animals must not be killed by drowning or freezing - freezing is an appropriate method of euth for some aquatic species?</p> <p>General Information</p> <p>We submit that this general information only relates to emergency euthanasia carried out under section 138 of the Animal Welfare Act 1999. There are many more circumstances where euthanasia is carried out in a temporary housing facility. Therefore this general information is not general enough</p>	<p>Disagree</p> <p>Maybe, but not all</p> <p>Noted</p>
10 Euthanasia	24	<p>We recommend that the following example indicators are incorporated as minimum standards: ‘ A documented protocol is in place that ensures: – Animals are euthanased by methods prescribed in relevant codes of welfare or in relevant, accepted guidelines. – Persons undertaking humane killing or euthanasia are appropriately trained, and where possible, should be euthanised by a veterinarian. - Death is confirmed following the procedure in a manner appropriate to the species.’</p>	<p>Already there</p>
10 Euthanasia	28	<p>The RNZSPCA submits that sub point 2 in Example indicator point 1 be made a minimum standard which reads – “Persons undertaking humane killing or euthanasia must be appropriately trained”.]</p> <p>The RNZSPCA submits that sub point 3 in Example indicator point 1 be made a minimum standard which reads – “Death is confirmed following the procedure in a manner appropriate to the species”.</p> <p>The RNZSPCA submits that Example Indicator point 2 be reworded and ‘2 year’ be replaced with ‘1 year’, to read – “Where a necropsy has been carried out on an animal that has died or been euthanased, full and comprehensive records outlining the procedures and are available and held for a minimum of 1 year after the event”.</p> <p>The RNZSPCA submits that Recommended Best Practice (a) have the words ‘Animal Welfare’ inserted to better define the ‘Act’ which is being referred to.</p> <p>The RNZSPCA submits that the ‘general information’ paragraph is too specific and needs to be reconsidered.</p> <p>The content only relates to emergency euthanasia carried out under section 138 of the Animal Welfare Act 1999. There are many other circumstances where euthanasia is carried out in a temporary housing facility.</p> <p>The RNZSPCA submits that the World Society for the Protection of Animals (now World Animal Protection) ‘Methods for the euthanasia of cats and dogs: comparison and recommendation’ document also be referred to where reference is made to the American Veterinary Medical Association euthanasia guidelines.</p>	<p>MS modified</p> <p>Already there</p> <p>Agreed</p> <p>Disagree</p> <p>Noted</p> <p>Agreed, reference included</p>

		See Appendix C of this submission.	
11 Quality Management	3	<p>Operating procedures for routine tasks including admittance, rehoming or sale, communal housing, transportation, isolation, provision of medication and veterinary care, euthanasia and emergencies</p> <p>Delete communal housing for catteries</p> <p>Operators may find it helpful to adopt or adapt an industry-generic quality assurance programme. Such an approach could facilitate the development of industry-led standards on such details as code-compliant minimum enclosure size or special considerations for the welfare of animals currently not covered by a detailed companion animal code. While the quality assurance programme should be based on the general principles of Standard AS/NZ 9001 or similar, it is not essential that the quality assurance programme be certified under the JASANZ (Joint Accreditation Standards for Australia and New Zealand) certification scheme.</p> <p><u>I think accreditation is a must</u> with visits to properties without prior approval especially over holiday periods.</p>	<p>Noted, Catteries not specified</p> <p>Noted</p>
11 Quality Management	15	Assure Quality has approached us in the past to get certification from them for our boarding facility. We have opted not to do this as hardly any Kennels have chosen to do this, and it is unknown to the general public, due to thier lack of promotion. Even though after reading their documentation we are adhering to their standards, it seems it would be a waste of money to invest in this. It is also an unknown entity as to who would audit the scheme if we were to implement our own Quality systems. This would need to be determined for any such system to work effectively.	Noted
11 Quality Management	18	<p>Minimum Standard No.17 – Quality Management</p> <p>(i) Support that all facilities should be managed under a documented quality management scheme to ensure they are complying with the code.</p> <p>(ii) I oppose the idea that facilities can be self-regulated and operate under their own quality management scheme. This is not done now, there would be no reason to think it would be done in the future, once the Code of Welfare is updated, under self-regulation.</p> <p>(iii) Unfortunately New Zealand is sadly lacking in the area of rules and regulations pertaining to boarding establishments. You don't need a licence and anyone can start and/or operate such a facility. Therefore a documented quality management scheme is a good place to start. But, who is to police it?</p> <p>No governing body means no annual inspection on literally hundreds of boarding kennel and cattery facilities throughout the country. Some facilities are in appalling conditions and in desperate need of upgrading. Pet owners have returned from holidays to find their dog or cat injured, near death or dead from mis-adventure, or even missing. Where are the repercussions here? Where do pet owners officially go to lodge a complaint and seek some sort of compensation? Currently nowhere.</p>	<p>Noted</p> <p>MS removed</p>

		<p>Membership to the likes of AsureQuality or a similar governing body should be compulsory with annual audits at random. This would better ensure that owners/managers of boarding facilities are continuing to comply with all aspects of the code. The membership fee charged should be relevant to the size of the facility.</p> <p>New Zealand should be following the example of the United Kingdom where kennels and catteries cannot operate without a licence from the Local Authority, issued subject to certain conditions.</p>	
11 Quality Management	24	<p>We support the inclusion of a Quality Assurance scheme. However, we note that that if the Royal New Zealand Society for the Prevention of Cruelty to Animals (SPCA) is charged with reviewing and enforcing this scheme to ensure compliance with the Code, then difficulties are likely to arise given the very limited resources and lack of funding available to the SPCA. For this scheme to be meaningful, there would need to be adequate funding and/or resources allocated from other entities such as the Ministry for Primary Industries.</p>	Noted. MS removed
Civil Defence and Emergency Management	28	<p>There is no inclusion in the code for a Temporary Housing Facilities to have a Business Continuity Plan or a Civil Defense and Emergency Management disaster and evacuation plan in the case of an adverse event.</p> <p>Given that the Ministry for Primary Industries is now the lead agency for Animal Welfare in the National Civil Defense and Emergency Management Plan, it would seem prudent to include a paragraph on the roles and responsibilities of a temporary housing facility to ensure that they have the appropriate plans in place to ensure the welfare of animals in their care during an adverse event. It should not be relied upon other Animal Welfare agencies such as RNZSPCA or Animal Control to evacuate and take care of what is technically their legal responsibility. More emphasis needs to be placed / enforced on these businesses to ensure that they are able to self-evacuate or have provisions available.</p> <p>The RNZSPCA submits that a new section is included in Part 7: Facility Management called "Civil Defence and Emergency Management", outlining the requirements of establishments in the event of a natural disaster.</p> <p>The RNZSPCA submits that three new minimum standards are included as below:</p> <p>Minimum Standard No. XX – Civil Defence and Emergency Management</p> <p>a) Temporary housing facilities must have an emergency evacuation plan for adverse events.</p> <p>b) Staff and persons in charge must be suitably training to respond in adverse events.</p> <p>c) Reserve supplies of feed and water must be held for at least 1 week in the event of an adverse event.</p>	Adverse events section has been added.
Appendix 1	12, 20, 21, 22	<p>Appendix 1 animal welfare organisation: add: "individual or" "and care". Delete 'in need'.</p> <p>Add: animal trader - a person who deals with animals at a commercial level</p> <p>Add: 'isolation - A facility totally separated from all areas where animals are housed containing animals with known contagious diseases'.</p>	<p>Agreed</p> <p>Disagree</p> <p>Agreed</p> <p>Agreed</p>

		<p>Quarantine: Delete 'isolation'.</p> <p>Add: 'Staff - either paid or volunteer personnel tasked with caring for animals in a temporary housing facility as defined above'.</p>	
Appendix 1	17	<p>Animal welfare inspector - A registered SPCA Waikato is keen to see that "registered" is defined. Organisation, group of individuals, or an individual - we submit that many, many rescuers are individuals in communities and they must be held responsible within this code who attend to the welfare of animals, often in a voluntary capacity.</p> <p>Quarantine - we submit that for correctness and clarity this code must properly separate and define these two, quite different, facilities.</p> <p>A facility where animals are held separately from other animals for the purposes of assessment or preventing the possible spread of disease. May also refer to the separate housing of animals newly acquired or imported or awaiting export.</p> <p>Isolation facility</p> <p>A facility where animals that are sick or are suspected of illness are held separately from other animals for the purposes of treatment and preventing the spread of disease</p>	<p>Removed 'registered'</p> <p>Agreed</p> <p>Agreed</p>
Appendix 1	28	<p>The RNZSPCA submits that the section number in the 'temporary housing facility' definition be amended to reflect the updated section number '1.1.1'.</p> <p>The RNZSPCA submits that the 'quarantine/isolation facility' definition be amended to read-</p> <p>"Quarantine Facility</p> <p>A holding facility where incoming animals are kept to monitor for any signs of contagious disease or behavioural issues".</p> <p>The RNZSPCA submits that the below definitions be included:</p> <p>Animal Trader</p> <p>A registered organisation, individual or group of individuals who deal with animals at a commercial level.</p> <p>Drop Box - Also known as 'Amnesty box'</p> <p>A cage or box situated outside council pounds or animal welfare centres, which enables members of the public to dispose of animals after hours to the care of the pound or welfare centre.</p> <p>Isolation Facility</p> <p>A facility totally separated from all areas where animals are housed, containing animals with known contagious diseases.</p> <p>Staff</p> <p>Either paid or volunteer personnel tasked with caring for animals in a temporary housing facility as defined in section 1.1.1.</p>	<p>Agreed</p> <p>Agreed</p> <p>Disagree</p> <p>Disagree, not used in code</p> <p>Agree</p> <p>Agree</p>

Submission Questions

	QUESTIONS
1	Do you consider a code of welfare for the temporary housing of companion animals to be necessary? Are there any alternatives which would achieve the same outcome as having a code of welfare? If so what are they?
2	Do you agree that the minimum standards in this code are the minimum necessary to ensure that the physical, health, and behavioural needs of companion animals in temporary housing facilities will be met? For example, do the minimum standards reflect good practice (not just current practice), current scientific knowledge and available technology? If not, what alternatives do you suggest? Please state your reasons.v
3	Do you agree the example indicators given are appropriate to describe how to measure or assess the achievement of the intended outcome of the minimum standards? If not, what alternative(s) do you suggest? Please state your reasons.
4	Do you agree that the recommendations for best practice in this code are appropriate? If not, what alternatives do you suggest? Please state your reasons.
5	Do you think this code would change existing arrangements for the management of companion animals in temporary housing facilities? If so, how, and to what extent?
6	Will complying with this code involve costs for you or your business? For example, costs may include converting existing animal facilities or employing new staff.
7	What barriers do you see to the implementation of the proposed code and how might they be resolved?
8	What benefits do you see from having this code? Benefits may include, for example, increased certainty about animal welfare requirements or market gains.
9	What other impacts would this code have on New Zealand society, the economy, or the environment?

Q.	No.	Comment	NAWAC Response
1	2, 12, 20	We believe that a Code for the Temporary Housing of Companion Animals is necessary, and we welcome the opportunity to comment on the draft.	Noted
	15	Within our own facilities we do not think it is a necessity. However there are some other facilities that do not come up to a good standard of welfare for the animals.	Noted
	16	<p>Yes, there needs to be a code of welfare. However, such a code cannot be restricted to facilities such as Boarding Kennels, Rescue centres, organized re-homing facilities, pounds etc. Although difficult to implement, it needs to include in-home or other such pet-minding operations that are caring for companion animals in environments/situations that are different to their normal environment/situations.</p> <p>An alternative to a code of welfare might be to encourage/force compliance with a Quality Assurance programme. This assumes that such a programme exists and is appropriate. There are some questions over the suitability and applicability of the current AssureQuality programme...</p>	Noted
	19	Yes, I support the introduction of a code of welfare. This code is nicely stated to encompass a range of organised temporary housing environments.	Noted
	24	<p>A code to provide guidance to those who are temporarily housing companion animals is clearly necessary. Although the Animal Welfare Act 1999 ('the Act') establishes general obligations upon those in charge of animals, more specific recommendations are required in order to ensure that the welfare of animals being housed temporarily are met.</p> <p>However, it is submitted that a more favourable alternative to setting out these standards in a code is to have them incorporated into regulations that are directly enforceable. In order for the standards to serve the purpose they are drafted for, and to ensure strict compliance, they need to be directly enforceable against those who choose to breach them.</p> <p>Although the Animal Welfare Amendment Bill 2013 proposes to establish enforceable regulations, the Ministry for Primary Industries has stated that only an approximate 5% of the standards established in the codes of welfare will be incorporated into regulations. Unless all of</p>	Noted

		the minimum standards established in the proposed Code are incorporated into these regulations, the value of these new standards is likely to remain more notional than real.	
1	28	The RNZSPCA is of the view that a Code of Welfare covering temporary housing establishments is long overdue and will be beneficial to the welfare of animals housed therein. We do however have some misgivings at the intent of compiling a single code to cover such a wide variety of establishments and species, and wonder would it not have been both simpler and clearer to separate the purely commercial enterprises from the welfare or local council run facilities.	Noted
2	15	We agree as a minimum that these standards seem fair apart from the relevant sections we have submitted our comments on. (Extra Paperwork and Costs)	Noted
	16	<p>Yes, I agree that the minimum standards should ensure that the animal's needs are met.</p> <p>However, in formulating, prescribing and mandating minimum standards there is a very significant risk that many current facilities will not be able to comply. Many will be constrained by various factors, including:</p> <ul style="list-style-type: none"> • their current financial position – for most operations, this is a very poorly-paying business, done more for love and passion than for revenue • impossibility to alter existing structures – some structures will be older and run-down and cannot be replaced without considerable disruption to the business and their loyal customers • low financial reward for compliance – boarding rates are very low for the amount of time, effort and capital involved. While many New Zealanders are rapidly adapting to a new mind-set of dogs that traditionally slept outside to now sleeping on the bed, they are generally reluctant to pay the boarding rates commensurate with an expectation of fluffy duvets etc. • local government and RMA rules and requirements – in many cases it is almost impossible to obtain permission to do anything that will alter or create something different which could impact on other ratepayers. A dog-housing facility (Boarding Kennel, Pound, Rehoming Centre etc etc) will immediately have a possibility of noise as soon as the first dog arrives there. One dog is all it takes. The NIMBY syndrome cannot be avoided and councils etc will be affected... <p>The consequence of mandating a code of welfare, which has standards perceived to be too onerous, will result in several (many?) current facilities closing down rather than attempting to comply. While there may be some facilities that sorely need to cease operations, the simultaneous disappearance of numerous facilities may have adverse consequences on the welfare of the animals intended to support.</p>	Noted

	19	The draft code on the whole is very well written and thoroughly covers most aspects of dog health related to the boarding industry. It avoids prescriptively directing standards to maintain relevance to a range of companion animal sectors, but still nicely places expectations and requirements. I appreciate the inclusion of 'best practice' suggestions, as many facilities will enjoy the challenge of benchmarking and improving themselves towards these.	Noted
2	24	Overall, we consider most of the proposed minimum standards to be appropriate. However, we recommend the following amendments in order to ensure that the minimum standards meet the physical, health and behavioural needs of animals in temporary housing facilities. [see specific comments].	Noted
3	15	We think that some extra detail may be required for some of the example indicators so that there are less grey areas that are open to interpretation.	Noted
	16	Yes, the example indicators are appropriate. It is extremely difficult to offer examples as indicators of achieving minimum standards, however this draft has generally done an excellent job of this.	Noted
	24	Overall, we consider the example indicators provided for to be appropriate. However, we recommend the following amendments in order to ensure that the proposed minimum standards are suitably measured. [See specific comments].	Noted
4	15	If all of this was implemented then it is feasible that more staff may be required to be able to cope with the extra paperwork and administration involved in keeping to standards.	Noted
	16	Again, it is extremely difficult to include "best practice" and suggestions, when also trying to achieve legally enforceable minimum standards. This draft goes a long way to doing this. However, the gap between these is where the problems will occur. Unfortunately, I can't suggest any alternatives.	Noted. Amendment Act and regulations may improve this.
	24	Overall, we consider most of the recommendations for best practice to be sound. However, as noted in question number two above, there are certain recommendations for best practice that would be much more appropriate for inclusion as minimum standards.	Noted

5	2, 12, 20	We think that this Code will change existing arrangements for the management of companion animals in temporary housing facilities by clearly setting out the Minimum Standards which must be met and the Best Practices which should be achieved.	Noted
	15	The extra costs involved for ourselves would be the investment of scales for weighing dogs and cats. We would also need to employ more staff to cope with the extra administration that would be required, and paperwork.	Noted
	16	Yes, as presented in issue 2, I predict a substantial move away from traditional facilities. Until the financial incentives are strong enough for newer and better facilities to be offered, there is unlikely to be sufficient kennel space available. This may have a negative consequence on animal welfare. It is likely that many home-based boarding facilities will spring up.	Noted
5	19	Depending on the wording and inclusion of certain absolute requirements as discussed above, I predict a progressive move away from the older style boarding facilities, in favour of more internalised and significantly higher cost options. Home boarding will also increasingly take up more of the void left as aging boarding facilities are placed under increasing pressure to significant upgrades they cannot afford under their current cost models.	Noted
	24	At present, there is a lack of any direct standards drafted for the purpose of persons housing animals temporarily in their care. This means that animals in temporary housing are only protected by general anti-cruelty provisions set out in the Animal Welfare Act 1999. Although there are a few relevant codes for the more common companion animals, such as the Animal Welfare (Companion Cats) Code of Welfare 2007, these are by no means adequate to address the vast range and large numbers of companion animals housed temporarily. The enactment of this Code will change existing arrangements for the management of companion animals in temporary housing by imposing more specific legal obligations upon owners and persons in charge of animals. However, as stated above at question one, this Code must be incorporated into directly enforceable regulations (or made directly enforceable in itself) if it is to achieve the purpose for which it is drafted. Without directly enforceable regulations, the Code is unlikely to significantly change existing arrangements, or to have a real and recognisable impact on the welfare of animals housed temporarily.	Noted
6	15	Extra costs would also be of concern as per note on scales and extra staff, and possibly a computer and software upgrade if available.	Noted. Can use BCS.
	16	Yes, there will be a cost. Fortunately, we have implemented much or many of the examples/best practices/minimum standards.	Noted

	<p>We are one of the few facilities that board rabbits. These are high-need guests – for example we weigh the food in and weigh it out again every day, to monitor consumption. Our staff costs are horrendous – at least double the industry norm as a proportion of revenue.</p> <p>We are not a member and have not been accredited by AssureQuality. We are not convinced that complying with their standards and auditing regime will provide sufficient value and return for the effort and cost.</p> <p>Many facilities are operated more as a hobby and passion than as a business. It is not an easy industry to be in. Pets can be very dear to owners' hearts, and perceptions of inadequate care are quickly blown out of all proportion due to the emotions involved. We have tried to bring a professional level of care and commitment to our facility. As indicated earlier, we have at least 50,000 occasions each year to make an assessment of animal's health, well-being and happiness. This level of responsibility is onerous and pervasive. Adding a whole other layer of prescribed minimum standards, while theoretically a good idea, is a bit scary to contemplate. We have already developed an SOP manual. Now we might have to modify it to suit a different, external framework.</p>	
<p>19</p>	<p>Unsurprisingly, yes.</p> <p>6.1</p> <p>Direct costs: Increased administrative load, water testing, auditing services to code requirements, facility upgrades to improve and increase quarantine facilities, food storage, thermal insulation and once heating plant is installed, energy consumption. Depending on the wording and requirement of Clause 7.1 (temperature), this will potentially close some facilities outright, and for others commit them to upgrades that are unaffordable.</p> <p>6.2</p> <p>Indirect costs: It is physically impossible for me to work harder/longer to include the increased compliance systemisation and management that I as the owner will need to put in. This will reduce my available time to remain in the front line with my staff, staying current with the needs and personalities of the dogs in my care and responsibility. An increasing reliance on my team of staff is a risk and cost that will be a part of the new environment we must embrace.</p> <p>The additional threat of legal proceedings should a significant incident occur is a considerable increase to the risk profile for us as a family, business and an employer of eight other families. As demonstrated by media coverage in adverse events, there is no defence against the publicisation of adverse events that occur to dogs in your care. The reputational damage done is severe, and any failure to follow the code is further grounds for the media to vilify the facility involved. Following the subsidence of the initial incident coverage, the subsequent reporting on the investigation findings and hearing are further damaging reputational events. While demonstration of observance to codes is a legal defence against prosecution, this is often of minimal relevance in a media and social-media fuelled age, as demonstrated by this headline and ensuing forum debate:</p>	<p>Noted</p>

		http://www.trademe.co.nz/Community/MessageBoard/Messages.aspx?id=1454476&topic=19	
	24	As we are a legal organisation and do not house companion animals, this Code will not involve additional costs for us. However, once issued, we may provide charitable animal organisations with pro bono advice on the implementation of the Code.	Noted
7	15	We would possibly find we have less time due to extra paperwork required in the code. Therefore compromising the extra quality time our current clients enjoy on a daily basis.	Noted
	2, 12, 20	We do not see any barriers to the implementation of this Code.	Noted
7	19	<p>Cost. Cost. Cost. Contrary to some public opinion, operating a boarding facility is not a lucrative or easy existence. Money available for the essential maintaining and upgrading facilities is tightly constrained, and the best most businesses (including us) can do is prioritise what gets done first over a long timeframe. This Code of Practice will force a commitment to, and re-prioritisation of capital at the expense of other aspirational projects, and increased debt servicing costs (if borrowing is available based on financial position).</p> <p>Our long term plan has been to entirely redevelop our largest asset, our aged accommodation building, into something truly fantastic over a 10-14yr timeframe at an anticipated cost of \$500,000. Depending on the stringency of the final code, this may well require us to abandon such plans due to the more immediate compliance costs of upgrading the existing accommodation, committing us to maintaining the dated style and layout of 30yrs ago, at considerable personal disappointment to us and our present and future customers.</p> <p>The only way this barrier can be overcome is a public acceptance of significantly increased prices for the improving services they are accessing, allowing existing facilities to upgrade, and new players to tackle the formidable restrictions of the RMA in establishing new premises.</p>	
	24	<p>One major barrier to the effective implementation of the proposed code lies with enforcement. Due to enforcement difficulties, establishments and individuals falling within its jurisdiction are unlikely to be deterred from breaching the proposed minimum standards.</p> <p>Even in the event that these standards are made directly enforceable, the implementation of the Code is likely to be further hindered by the defective nature of the Act's enforcement regime. Currently, the enforcement of the Act with respect to companion animal welfare is left almost entirely to a private, underfunded charity, the SPCA.</p>	Noted

		<p>Delegating the enforcement of a criminal statute to a private charity that receives extremely limited government funding and support strongly undermines the likelihood that breaches of the Code will be detected and/or enforced. Currently, the ratio of inspectors to animals remains extremely low, at approximately one inspector per 50,000 companion animals. As pointed out in a recent New Zealand Universities Law Review article, this problem is exacerbated by the fact that many inspectors must work across a wide geographical region. This limits the inspection time in each locality, and constrains the ability of inspectors to respond to emergency situations.</p> <p>This charity-based enforcement regime inevitably limits the detection and prosecution of animal abuse. For instance, in 2011, the SPCA received 13,089 complaints from the public about mistreated animals, yet only initiated 35 prosecutions.⁴ Accordingly, less than 0.27% of complaints led to prosecutions. Furthermore, this low prosecution rate is not an anomaly but rather has continued over recent years.</p> <p>Consequently, in the absence of adequate enforcement, the minimum standards established under this Code are unlikely to have the legal effect intended. Rather, the defective enforcement regime will render the minimum standards analogous to the recommendations for best practice in providing mere guidance as opposed to creating effective legal standards.</p> <p>Resolving this major barrier to the effective implementation of the Code will require the Ministry of Primary Industries to allocate significantly more resources to the enforcement of the Act and the codes of welfare administered under it. Specifically, it must administer greater funding to the SPCA so that breaches of the minimum standards established in this Code can be investigated and addressed. This funding ought to be sufficient to facilitate routine inspections of establishments falling within the ambit of the Code to ensure compliance with the minimum standards, as well as to provide for the investigation of reported breaches.</p>	
8	2, 12, 20	The benefits from having this Code include increased certainty about animal welfare requirements in Temporary Housing Facilities resulting in a better quality of life for Companion Animals whilst they are in a Temporary Housing Facility, and afterwards should they be sold or rehomed.	Noted
	15	The benefits are that there should be an improvement in the welfare of companion animals in temporary housing facilities. Market gains will not change	Noted
	19	<p>Having adopted the voluntary AsureQuality code of practice in 2012, we were further challenged to improve and mature as a business by developing quality focussed strategies. For example, we and our staff have taken pride and confidence in the implementation of 4-daily regular health checks and weigh-ins, as these are essential in maintaining and monitoring the health, happiness and experience of the dogs in our care that is so important to us.</p> <p>I genuinely hope this code will do the same for others, and challenge them to develop for the benefit of their guests.</p>	Noted

	It would be hoped that increasing operational standards reduces the frequency of the extremely stressful experience of managing a negative situation where things have gone wrong, reducing the longer term emotional damage done to operators in our industry. This is however balanced against the increased risk that any such events will lead to complaints, a long period of prosecution, and the destructive outpouring aimed at a person deemed to be at fault.		
24	<p>The Code sets minimum standards for the care of companion animals kept in temporary housing situations. As noted above, these standards are not provided for in detail in either the Act or in any other relevant code. Accordingly, the Code provides greater clarity for both owners of animals and persons in charge in relation to their obligations under the Animal Welfare Act.</p> <p>Promoting and maintaining minimum standards will have a positive effect for many animal charities performing rehoming services, such as local animal shelters who will now have greater guidance in respect to the day-to-day operations of their organisations. Providing greater clarity for these organisations by virtue of the Code will promote the effective functioning of these organisations, which perform valuable charitable work for society. Charitable organisations may also find an increase in their credibility and ability to source donations.</p> <p>The Code also encourages a 'species specific' focus, such as in the construction of premises, food, water and shelter, etc. It places the onus on such organisations to ensure that their staff have 'species-specific' training/expertise and are competent. The Code promotes high standards of hygiene and health which are incredibly important as crowded holding facilities present as 'high risk' for the spread of disease. Thus, it would provide owners with some degree of reassurance of what to expect when they hand their animals over to the temporary care of others. Setting minimum standards also provides a framework for the effective auditing of establishments for compliance with the Act. For instance, the Code holds the potential to enable SPCA inspectors to identify breaches of the Act more readily and with much greater certainty than previously. However, the practical benefit of this feature of the Code is likely to be significantly undermined by the current underresourcing of enforcement.</p>	Noted	
9	15	The only other impact could be that the cost of temporary housing may have to increase to cover the extra costs associated with maintaining the administrative side of these standards. Therefore causing some people to leave their animals unattended at home when they go away. Potential placing a larger strain on the SPCA or Local Animal Control, due to complaint of unattended and stressed pets.	Noted
	19	<ul style="list-style-type: none"> • Increased fossil fuel/ electric heating demand and related green house gas emissions in operating heating plant • Increased construction activity and building material consumption contributing to economic activity • Increasing cost to dog owners to access boarding facilities • Higher debt burden and risk in boarding industry 	Noted

	<ul style="list-style-type: none"> • More obligations placed on poorly resourced animal welfare groups including the SPCA, Huha etc. 	
24	<p>The Code gives greater effect to the Act and ensures that animals held in such temporary places are provided with 'species-specific' standard of welfare. Companion animals, including strays, are likely to have their welfare needs better met as the Code ensures consistency across the varied forms of temporary accommodations that have them in their care.</p> <p>With the information contained within the Code, owners, consumers and the organisations themselves can advocate, demand and strive for best practice. This is likely to have several positive flow-on effects for society. For instance, animals that have had adequate physical and psychological care will be passed on or back to content owners. This may result in a decrease in veterinary and hospital fees, abandonment of pets, prosecutions relating to management of companion animals or injury to companion animals, etc. It may in turn reduce the burden on animal rescue organisations and the court system.</p> <p>However, as emphasised throughout this submission, from a legal perspective these benefits are unlikely to come into full fruition unless the standards are given "teeth" by virtue of being made directly enforceable. This lack of enforceability of the Code is a fundamental flaw of what is an otherwise favourable development for animal welfare in New Zealand.</p>	Noted