



8 July 2022

Animal Welfare Policy
Ministry for Primary Industries
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Proposed Code of Welfare for Pigs and Associated Regulations: Ministry for Primary Industries and National Animal Welfare Advisory Committee Discussion Paper*.

Yours sincerely

Katherine Rich
Chief Executive



**Proposed Code of Welfare for Pigs and
Associated Regulations: Ministry for
Primary Industries and National Animal
Welfare Advisory Committee Discussion
Paper**

**Submission by the New Zealand Food & Grocery
Council**

8 July 2022

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“**NZFGC**”) welcomes the opportunity to comment on the *Proposed Code of Welfare for Pigs and Associated Regulations: Ministry for Primary Industries and National Animal Welfare Advisory Committee Discussion Paper* (the “**Discussion Paper**”)
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

OVERARCHING COMMENTS

3. NZFGC identifies below a number of options that are available to address what are seen as impracticalities, ineffectiveness and economic costs of the NAWAC proposals. These point to NAWAC’s proposals as going well beyond the minimum necessary to ensure that the physical, health and behavioural needs of pigs are met often without justification or evidence of benefit.
4. MPI’s analysis is of many of the proposals are qualitative, very general and not costed. The Sapere analysis, in part, supports the view that the proposed changes are impractical, ineffective and economically costly but severely underestimates the resource and building cost realities for the sector to implement changes to be compliant. It does not address farmer health and welfare which more properly sits with MPI and Government. Factoring the costs in, together with the mental health impacts of zero income farmers for many years, it appears the NAWAC direction is to efficiently and effectively end New Zealand’s commercial pig farming.
5. The alternative is for MPI to:
 - be guided by science
 - implement the minimum necessary regulation
 - provide for adequate and reasonable transition
 - hold imports to the same standards in welfare as we do for packaged food for food safety and labelling
 - protect farmer health and wellbeing and regional employment
 - ensure food security, and
 - continue to provide the New Zealand consumer with choice of New Zealand grown pork.

DETAILED COMMENTS

6. NZFGC is particularly focussed on the key areas of international developments, sow and piglet interactions and piggery environments, and the practicality, efficiency and economics of the proposals.

International developments

7. We appreciate the *Animal Welfare Act 1999* provides for the welfare of animals in New Zealand and puts obligations on people who own or are in charge of animals. New Zealand is highly regarded for its animal husbandry, a reputation that has resulted in a range of senior positions (including President) in the World Organisation for Animal Health, formerly

the Office International des Epizooties or OIE. It is for this reason that the international and science-based environment is important.

8. NZFGC understands that New Zealand is already a world leader in the animal welfare of pigs. Our top five countries of import (Germany, USA, Poland, Spain and Australia) do not do well in comparison but we are not suggesting a race to average practice but rather a measured, science-based approach that continues to place New Zealand in a position of pig animal welfare strength.
9. It is therefore significant that a number of areas, such as the farrowing, space and weaning proposals in the Discussion Paper, appear to ignore the science and the recommendations of veterinarians.

Sow and piglet interactions

Farrowing

10. NZFGC is advised that no country supports free farrowing without qualification for science-based animal welfare reasons. Some confinement around farrowing supports the welfare of sows and piglets¹. Our top five importing countries set standards that allow 28 days although Germany is working through a planned transition to temporary confinement to be achieved by 2035. This transition is financially supported by the German government. Short-term confinement that coincides with the most critical days of a piglet's life and the period where sows are intentionally very inactive benefits piglet welfare while enabling the sow opportunities for more freedom of movement.

Response to Questions 1-3, 6, 7

11. We support the industry view that the amount of time during which a farrowing sow may be confined is limited to seven days in total (up to 3 days before farrowing and 4 days after farrowing). We support this approach to allow for research into New Zealand conditions as to how farmers can meet the pre-farrowing restriction in practice. These and related requirements (such as the provision of manipulable material) retain New Zealand in the top animal welfare position for this aspect ahead of the standards required in the UK, EU, USA, Canada, Australia and China (which collectively produce the great majority of pork in the world).
12. This position is supported by the New Zealand Veterinary Association such that sows should not be confined unless this is absolutely necessary but "given the difficulty in accurately predicting time of farrowing, that the sow is confined for no more than seven (7) days in total during any lactation."² This position was confirmed in the Chidgey³ research.

Space allowances

13. NZFGC understands that the options presented in the Discussion Paper in relation to space allowance are not based on science for reflecting a minimum standard. The science supports an increase for New Zealand but the best available science supports a k value (the multiplier of body weight to calculate minimum area) of 0.034 NOT the values of 0.047

¹ See for example Chidgey KL, Morel PCH, Stafford KJ, Barugh I. "The performance and behaviour of gilts and their piglets is influenced by whether they were born and reared in farrowing crates or farrowing pens". *Livestock Science*, Sep 2016. DOI:[10.1016/j.livsci.2016.09.011](https://doi.org/10.1016/j.livsci.2016.09.011) and Chidgey KL, Morel PCH, Stafford KJ, Barugh I. "Observations of sows and piglets housed in farrowing pens with temporary crating or farrowing crates on a commercial farm". *Applied Animal Behaviour Science*, January 2016. DOI:[10.1016/j.applanim.2016.01.004](https://doi.org/10.1016/j.applanim.2016.01.004)

² NZVA *Position Statement Housing of lactating sows indoors*, June 2022

³ Chidgey KL, Morel PCH, Stafford KJ, Barugh I. "The performance and behaviour of gilts and their piglets is influenced by whether they were born and reared in farrowing crates or farrowing pens". *Livestock Science*, Sep 2016. DOI:[10.1016/j.livsci.2016.09.011](https://doi.org/10.1016/j.livsci.2016.09.011)

or 0.072 as set out in the options. No other countries apply the proposed k values of 0.047 or 0.072.

Response to Questions 8-10

14. NZFGC supports the industry view that the space allowance for New Zealand should be increased to the scientifically supported k value of 0.034. It is important to note that grower pigs 'grow' into space so that for most of the production cycle they have considerably more space than the minimum.

Weaning

15. NZFGC is also advised, in relation to weaning, that New Zealand piglets are on average 2kg heavier than their counterparts internationally. As a result, the piglets are bigger, stronger and more developed in all areas.

Response to Questions 11, 12

16. NZFGC supports the industry view that, to protect the welfare of sows, retaining the minimum weaning period of 21 days provides the optimum, science-based weaning arrangements in the New Zealand environment.

Docking

17. NZFGC understands that evidence of tail biting should not be required to justify the need for tail docking. No country that prohibits tail docking has managed to prevent the negative and significant welfare impacts associated with tail biting. Tails are manipulable material and once tail biting starts, we understand it is very difficult to control. The intention should be prevention.

Response to Question 21

18. NZFGC supports the industry view that elective husbandry procedures must only be carried out where they are justifiable to prevent undesirable consequences that could subsequently result in animal suffering. We also support measures that do not endanger fire hazards (such as the use of hot iron cautery).

Animal welfare management plans

19. NZFGC is aware that in the food processing area where food control plans and national programmes have been in place for almost a decade, they sit alongside recognised, industry developed programmes such as NZGAP to provide assurance for the safe and sustainable production of fruit and vegetables in New Zealand.

Response to Question 23

20. NZFGC supports the industry view that PigCare should be a recognised equivalent to other quality assurance programmes in the industry. The Animal Welfare Code therefore needs a facility for such recognition.

Response to Questions 25 and 27

21. In summary, NZFGC considers that NAWAC's proposals go well beyond the minimum necessary to ensure that the physical, health and behavioural needs of pigs are met often without justification or evidence of benefit. This is especially the case in relation to farrowing, space and weaning age. We understand that the recommendations of the New Zealand Veterinary Association⁴ support this position.

Practicality, efficiency and economic outcomes

22. NZFGC is concerned that many of the NAWAC proposals are not practical nor will they result in best practice regulation. They will not be the minimum necessary to ensure the

⁴ See for example NZVA *Position Statement: Housing sows during mating*

animal welfare objectives are met and will not be proportionate to the risks being managed. Significantly they will impose extraordinarily high costs on the sector with flow-on effects for processing and consumer choice.

Response to Questions 31-44

23. NZFGC considers that regulation is either not required (eg in relation to weaning) or does not reflect a science-based position as the foregoing attests.

Food security

24. NZFGC has been, and continues to be, central to ensuring the New Zealand food supply has continued throughout the very testing times we are experiencing – starting with Covid but continuing with world uncertainty, logistical and supply chain interruptions of a magnitude only experienced during world wars. In such an environment, food security is paramount.
25. The NAWAC proposals, if adopted will result in an investment requirement that will likely end pig production and pork manufacture of New Zealand grown pork in New Zealand. MPI's analysis of many of the proposals are qualitative, very general and not fully costed.
26. NZFGC is aware that the Sapere analysis⁵ overestimated farm profitability and failed to account for building cost increases. Even so, its analysis clearly shows that the cost impacts of the four main proposed changes (farrowing, weaning, space and behaviour) are together likely to require an investment of \$2.5m per commercial producer (of 350 sows) to implement. Sapere estimates it would take each commercial producer over 19 years of zero income to recoup the investment required to meet the NAWAC proposals. On this basis very few, if any, commercial businesses would survive and New Zealand would become a price-taker of imported pork. This 'off-shoring' of pork production raises three issues
- animal welfare
 - regional and environmental concerns
 - consumer choice.
27. As pork and pork products increase in price (once the commercial industry is decimated), non-commercial operators, who generate the vast majority of complaints and animal welfare issues for New Zealand now, will proliferate. Backyard operations will increase as will homekill. The animal welfare issues can be expected to rise at an increasing rate.
28. The criteria of effectiveness and economics would not be met.
29. The pork industry in New Zealand is small but with two thirds in the South Island, it is an important feature of regional New Zealand. It is also a component in a number of processed foods. Off-shoring pig production will see the New Zealand pork industry largely disappear and impact rural employment and communities. It will also be contrary to the Government's first Emissions Reduction Plan, where avoidable importation will unnecessarily contribute to global emissions for delivery to New Zealand.
30. Should the New Zealand commercial pork industry disappear, consumers would lose choice or at least pay a premium not only for pork but also for bacon, ham and related processed products.

⁵ MacIntyre P, Milkop A. *Economic Analysis of proposed changes to Code of Welfare Pigs*. Sapere, 2022.

31. Importantly, we should hold imports to the same standards in welfare as we do for packaged food in food safety and labelling and fresh food for biosecurity reasons. We hold imported packaged food to New Zealand standards to protect human health and consumer choice; we hold fresh food to New Zealand biosecurity standards for environmental and economic reasons. There is justification to hold New Zealand pig and pork imports to New Zealand Animal Welfare standards for animal health and welfare and consumer choice reasons.

Response to Questions 44-52

32. NZFGC has identified a number of options that are available to address the impracticalities, ineffectiveness and economic costs of the NAWAC proposals. The Sapere analysis, in part, supports this view but severely underestimates the resource and building cost realities for the sector. Factoring this in, together with the mental health impacts of farmer zero income for many years, it appears the NAWAC direction is to efficiently and effectively end commercial farming. Saved government revenue from production management oversight would then have to be diverted into 'recreational' pig animal welfare.

Response to Questions 55 and 57

33. The alternative is for MPI:

- to be guided by science
- implement the minimum necessary regulation
- provide for adequate and reasonable transition
- hold imports to the same standards in welfare as we do for packaged food in food safety and labelling
- ensure food security
- protect farmer health and wellbeing and regional employment, and
- continue to provide the New Zealand consumer with choice.