

**NZPork: Additional Feedback on Proposed Animal Welfare Regulations for Pigs (September 2017)**

**10. Pigs – dry lying area**

NZPork fully supports that access to a comfortable dry lying area is an important aspect in providing well for the welfare of pigs.

However information provided to MPI in our additional submission (November 2016) and discussions to date with MPI illustrate that the provision of suitable lying area for pigs, across all farming types, is impacted by a wide range of interacting factors. Therefore specifying a ‘black and white’ regulation is particularly complex.

We agree that it is most appropriate to specify a regulation separately for indoor housed and outdoor to reflect the very different circumstances of these broad housing / shelter types. This approach mirrors the approach in the Animal Welfare (Pigs) Code of Welfare 2010, which covers indoor housed and outdoor shelter separately.

We do not support the words ‘*constant access to a dry lying area*’ because these words cannot be fully delivered in any situation if taken literally.

In indoor systems, it is not possible to control where pigs urinate or defecate nor, given this, is it possible to maintain any semblance of cleanliness on other than fully slatted floors without regular hosing. Aside from these practical but real issues, the proposed regulation does not reflect the preferences of a pig and thus potentially its needs in all situations i.e. where a pen has dry and wet areas, it is very normal for the pigs in the pen to choose to lie on the wet area. This choice is denied if the whole pen is constantly dry. This is explained in NZPork’s additional submission (November 2016).

Our suggestion is for words along the lines below:

**FOR INDOORS:** *The owner or person in charge of a pig must ensure it has access to a comfortable and dry lying area, that is free from ponding and not excessively fouled.*

**FOR OUTDOORS:** *The owner or person in charge of a pig must ensure it has access to a dry lying area, free from through-draught, and shelter that provides protection from extremes of heat and cold.*

In our additional submission (November 2016), and in our discussions, we explained the basis on which the PigCare™ welfare assurance programme currently assessed that pigs, housed indoors, were provided with a comfortable dry lying area. The assessment summarised this important factor in the overall farm assessment as:

*Any ponding covers less than 50% of the available floor area.*

Assessment of the adequacy of a comfortable dry lying area (for indoor housed and outdoors) has now been further expanded within PigCare™ as below:

For indoor housed pigs each class of pig (weaners, growers, dry sows, lactating sows, boars) is given a rating in relation to the total set of minimum standards within No. 6. This may be further qualified by the assessor’s comments.

For outdoor pigs, each class of pig (weaners, growers, dry sows, lactating sows, boars) receives a rating in relation to the two minimum standard within No. 5. This may be further qualified by the assessor’s comments.

(Note that on a farm there may be more than one farming type: for example, outdoor breeding and indoor housing of growers is common. In this case each class of pig would be assessed in the appropriate category.)

As well as the above assessment against the minimum standards for each class of pig, a **Presentation** assessment is done. This assessment is now a requisite for PIgCare™ accreditation. It covers 3 general areas - Facilities, Housekeeping, and Welfare, in each case based on an assessment of the farm overall.

A comfortable dry lying area is heavily weighted as it is assessed in each of these 3 areas, viz: within Facilities (rate *the ability of the facilities to provide a comfortable, dry lying area);* Housekeeping (rate *the hygiene of the pig pens and facilities);* and Welfare (*availability of clean and dry lying area in pens).*

The evolving approach within PigCare™ is a graphic illustration of the complexities of assessing access to a comfortable dry lying area.

We are most concerned to ensure the wording in the regulation/s is clear and ‘stand alone’, and reflects good practice methods of providing for pigs’ requirements. We do not support the concept of requiring an ‘overlay’ of interpretation for compliance and enforcement.

**26. Pigs – lying space for grower pigs**

As we have explained in our submissions on the proposed Animal Welfare regulations (both the May 2016 submission and November 2016 additional submission) we are highly concerned about the wording of this proposal and how it may be interpreted across all types of housing: for example, where fully slatted floors are used the total area of the pen provides for lying and dunging, as dung simply falls through the slats. A great benefit of fully slatted flooring is its hygiene management.

In other systems, where a dunging area, as part of a total slab, and /or an open drain, is provided, this area would be excluded from the total area.

In addition, area or space occupied by troughs or feeders, would be excluded.

Because this proposed regulation sets a minimum space it needs to reflect that housing / flooring type where the minimum space is required to provide for welfare of the grower pigs. This is a fully slatted flooring system, where lying and dunging occur in the same area.

For the reasons fully explained in our May 2016 and November 2016 submissions, we recommend the regulation is worded as:

*The owner or person in charge of a grower pig must ensure it has a minimum area of, at least: Area (m2) per pig = 0.03 x liveweight0.67(kg).*

Because a regulatory impact assessment has not been done on the wording proposed by MPI, a regulatory impact assessment would be required to be part of the overall assessment before the MPI proposal could become regulation.

Note:

The minimum space allowance is based on work by Edwards et al (1988) and further assessed by Spoolder et al (2000) across various flooring types. (Refer full discussion in our May 2016 submission.)

We have provided copies of these two articles alongside this paper, for further information.

(The Edwards et al article provides a useful reference of how different ‘constant’ (K*)* values relate to the lying positions of the pigs. For example:

* K = 0.018 for space occupied in sternal position
* K =0.027 for preferred space for resting of a group.)

27. **Pigs – size of farrowing crates**

For clarity, we recommend the addition of the phrase shown in red below for clarity:

*The owner or person in charge of a sow must not keep it in a farrowing crate where the sow cannot avoid touching both sides of the crate simultaneously, or touching the front and the back of the crate simultaneously, or touching the top of the crate* *with its back* *when standing*.

 **Pigs – Dry lying area**