



## **ANIMAL WELFARE**

National Animal Welfare Advisory Committee

# Annual Report 1 January to 31 December 2013

National Animal Welfare Advisory Committee C/o Ministry for Primary Industries PO Box 2526 Wellington 6140 New Zealand

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# **National Animal Welfare Advisory Committee**

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## 1 Chairman's comment

NAWAC has completed its review of the 2003 rodeos code of welfare and recommended it to the Minister this year. In addition the Committee conducted public consultation on the new horses and donkeys code of welfare and reviewed the timeline for phasing out battery cages under the layer hens code, recommending a change of two years for the initial phase to the Minister. Work also proceeded on the development of an amendment to the dairy cattle code to address housing systems, which has now been out for public consultation; work has also continued on a proposal for a consolidated code to address welfare issues arising from the use of animals in public display, entertainment and exhibition. The Committee has continued to be heavily involved in developing advice for MPI and the Minister on proposals for an Animal Welfare Strategy and the



revision of the Animal Welfare Act. The effect of these proposals is likely to result in some significant changes in the way NAWAC operates in the future and the Committee is developing new procedures to address these potential changes, particularly its new role in advising the Minister on regulations under the Animal Welfare Act.

During 2013 Don Nicolson retired after completing two three-year terms. Don's practical farming background was invaluable to the Committee and he made a significant contribution to the proposed dairy housing review. Katie Milne, a West Coast dairy farmer, has replaced Don.

Once again I would like to acknowledge the careful and thoughtful contributions from all NAWAC members as we have worked through the challenging issues we have to consider, and their combined ability to put aside any personal interests and strive for consensus in the best interests of animal welfare. Committee members have given a large amount of time to the work of NAWAC, with most members serving on 2 or 3 of its subcommittees as well.

The Committee has continued to receive excellent technical and policy support from MPI that is essential to the effectiveness of our work.

Finally I would like to acknowledge the continuing strong support of the Minister for the work of the committee.

Dr John Hellström

Chairman

# 2 The Committee

#### 2.1 Legal status of the Committee

NAWAC is a ministerial advisory committee established under the Animal Welfare Act 1999. The Animal Welfare Act 1999, which sets core obligations on those responsible for the care of animals, came into force on 1 January 2000 and has been amended by Animal Welfare Amendment Acts in 2000, 2001, 2002, 2005, 2007, 2009 and 2010.

#### 2.2 Functions

The functions of NAWAC, as set out in section 57 of the Animal Welfare Act, are to:

- advise the Minister for Primary Industries on any matter relating to the welfare of animals in New Zealand, including legislative proposals concerning the welfare of animals and areas where research into the welfare of animals is required;
- make recommendations to the Minister relating to manipulation of animals and surgical procedures to be performed on animals;
- advise the Minister in relation to whether particular traps or devices should be declared prohibited or restricted, and any conditions that should be attached to the sale or use of any restricted trap or device;
- make recommendations to the Minister concerning the issue, amendment, suspension, revocation and review of codes of welfare; and
- promote, and assist other persons to promote, the development of guidelines in relation to the use of traps or devices or both and the hunting or killing of animals in a wild state.

#### 2.3 Legal requirements and selection of appointees

NAWAC consists of a chairperson, the National Animal Ethics Advisory Committee (NAEAC) chairperson, and up to nine other members with knowledge and experience in:

- · veterinary science;
- · agricultural science;
- · animal science;
- the commercial use of animals;
- the care, breeding and management of companion animals;
- · ethical standards and conduct in respect of animals;
- · animal welfare advocacy;
- the public interest in respect of animals;
- · environmental and conservation management; and
- any other area the Minister considers relevant.

Members are appointed to NAWAC by the Minister after consideration by the Cabinet Appointments and Honours Committee and the Cabinet. Appointments are generally for a three-year term, although members may be reappointed for a second term and, in exceptional circumstances, a third. Members serve in their personal capacity and not as representatives of their employer or nominating body.

# 2.4 Membership

Members	Expiry of Appointment
<b>Dr John S Hellström</b> ONZM, BVSc, PhD, Director Biosecurity Ltd (independent chairman)	31.10.15
<b>Dr Kathryn B Bicknell</b> BSc, PhD, Senior Lecturer in Economics, Lincoln University (independent appointment)	31.10.15
Ms Susan (Sue) E Brown CA, BBS, Chartered Accountant (nominated by the Ministry of Women's Affairs)*	31.10.16
Mrs Ingrid Collins MNZM, Chief Executive/Part Owner Three Rivers Medical Ltd (nominated by Te Puni Kokiri)	31.10.15
<b>Dr Penelope (Penny) M Fisher</b> BSc, MAppISc, PhD, Wildlife Toxicologist & Research Leader, Landcare Research NZ Ltd (nominated by Landcare Research NZ Ltd)	31.10.14
<b>Ms Katrina (Katie) S Milne Farmer,</b> National Board Member Federated Farmers (nominated by Federated Farmers of New Zealand)**	31.10.16
Dr Barbara Nicholas BSc, BD, Dip Tch, PhD, Ethicist (independent appointment)	31.10.15
<b>Mr Donald O Nicolson Farmer,</b> National President Federated Farmers of New Zealand to July 2011 (nominated by Federated Farmers of New Zealand)	31.10.13
<b>Dr Karen M Phillips</b> BVSc, MACVSc, Veterinarian (nominated by New Zealand Veterinary Association)	31.10.14
<b>Dr David R Scobie</b> BAgSc (Hons), PhD, Scientist (nominated by New Zealand Society of Animal Production)	31.10.15
Mr Alan J Sharr CA (PP), DTM, MInstD, Principal, Marriotts Chartered Accountants (independent appointment)	31.10.15
Dr Virginia M Williams BVSc, MANZCVS, DipProfEthics (chairperson of NAEAC)	31.10.15

<sup>\*</sup>Ms Sue Brown was reappointed for a second term on the Committee.

 $<sup>\</sup>ensuremath{^{**}}\mbox{Ms}$  Katie Milne was appointed for a three-year term and replaced Mr Don Nicolson.

#### 2.5 Deputy chairperson

Dr Karen Phillips served as deputy chairperson for 2013.

#### 2.6 Secretariat

Ms Marie Guigou served as Secretary of NAWAC in 2013. Dr Cheryl O'Connor, Dr Mark Fisher, Dr Kate Littin, Dr Nicki Cross, Krissy Moreau, Colin Holden and Holly Foran of MPI also provided excellent support and assistance to the Committee.

#### 2.7 Fees

The daily fee for members was \$400 (\$550 for the chairperson). This fee is paid for attending meetings plus preparation time. Members are also reimbursed for travelling expenses. In addition, the chairperson and, on occasion, other members may be paid additional fees for representing the Committee at other meetings, including a large amount of subcommittee work in developing codes of welfare, or for carrying out significant extra work on the Committee's behalf. The following table shows fees paid in 2013.

Member	Fees paid during 2013 (gross)
J Hellström <sup>1</sup>	\$22,376.33
K Bicknell	\$2,400.00
S Brown	\$3,286.60
I Collins	\$2,600.00
P Fisher <sup>2</sup>	\$0.00
K Milne	\$400.00
B Nicholas	\$2,800.00
D Nicolson	\$3,000.00
K Phillips	\$2,800.00
D Scobie <sup>2</sup>	\$0.00
A Sharr	\$2,800.00
V Williams	\$3,000.00

<sup>1</sup> The Chairman undertook extensive liaison with animal welfare, industry and other groups, and with MPI, regarding the writing and content of draft codes of welfare and regarding other NAWAC business, in addition to preparing for and conducting formal NAWAC meetings and special meetings.

<sup>2</sup> Dr Fisher's and Dr Scobie's fees were paid directly to their employer as recompense for time lost from their primary employment. Payments shown are for work outside primary employment hours.

#### 2.8 Operations

#### 2.8.1 Ordinary meetings

NAWAC holds four ordinary meetings per year. Attendance at the ordinary meetings for 2011-2013 is shown below. Additional subcommittee meetings were held to consider codes of welfare.

Member	15/02/11	17/05/11	17/08/11	27- 28/10/11	08/02/12	16/05/12	15/08/12	14/11/12	13/02/13	15/05/13	14/08/13	13/11/13
J Hellström	•	•	•	•	•	•	•	Χ	•	•	•	Χ
K Bicknell	•	•	•	•	•	•	•	•	•	•	•	•
S Brown	•	•	•	•	•	•	•	•	•	•	•	•
H Collier	•	•	•	•	•	Χ	•	-	-	-	-	-
I Collins	-	-	-	-	-	-	-	•	•	•	•	Χ
P Cowan	•	Χ	•	•	-	-	-	-	-	-	-	-
P Fisher	-	-	-	-	•	•	•	•	•	•	Χ	Χ
B Nicholas	Χ	•	•	•	•	•	•	•	•	•	•	•
D Nicolson	•	Χ	Χ	Χ	•	•	Χ	•	•	•	•	•
K Phillips	•	•	•	•	•	•	•	•	Χ	•	•	•
J Prattley	•	•	•	•	•	•	•	-	-	-	-	-
D Scobie	•	•	•	•	•	Χ	•	•	•	•	•	•
A Sharr	-	-	-	-	-	-	-	•	Χ	•	•	•
V Williams	•	•	•	•	•	•	•	•	•	•	•	•

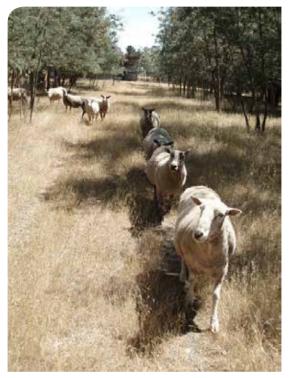
• Present, x Absent, - Not applicable

#### 2.8.2 Site visits

Various committee members made the following site visits during 2013, mainly in a personal capacity at their own expense:

- Wellington Zoo;
- · Auckland Zoo;
- Melbourne City Zoo;
- Orana Wildlife Park;
- Dunedin City Aviary;
- Orokonui Ecosanctuary;
- Queenstown Kiwi Birdlife Park;
- Te Anau Wildlife Centre;
- Palmerston North City Aviary;

- Opoutere Bird Sanctuary;
- Landcare Research animal facility;
- David Scobie's welfare-friendly sheep.



David Scobie's welfare-friendly sheep



Orana Park



Wellington Zoo



Landcare Research

#### 2.8.3 NAWAC guidelines

NAWAC has, from time to time, prepared non-binding guidelines to assist in its activities. These outline the approach NAWAC takes, and provide guidance for members working through complex and contentious issues. The most recent review of the guidelines was completed in 2011. See appendix 2 for a full list of completed NAWAC guidelines.

## 2.8.4 Annual reports

An annual report detailing NAWAC's activities has been published each year since 1990.

Copies may be obtained from:

The Secretary National Animal Welfare Advisory Committee PO Box 2526 Wellington 6140

 $Email\ animal welfare @mpi.govt.nz$ 

The annual reports are also available on the internet at: http://www.biosecurity.govt.nz/regs/animal-welfare/nawac/annual-reports

# 3 Codes of Welfare

#### 3.1 Process for development of the codes and consultation

The formal process for the development of codes of welfare includes:

- *NAWAC's determination of development priorities for codes of welfare.* These are agreed on an annual basis.
- The agreement between the code writing group and the Manager (Codes of Welfare) MPI Animal Welfare Standards on the terms of reference for the writing group, timetable, progress reporting and identification of the representatives of affected persons (including organisations) who should be consulted. Any person or organisation may draft a code of welfare and submit it to NAWAC for consideration, or NAWAC may appoint a writer or writing group to prepare a draft code.
- Submission of the draft code to NAWAC. NAWAC will usually appoint a subcommittee and chairperson
  to undertake the detailed analysis of the draft code, of public submissions and of any submissions from
  the code writing group.
- NAWAC's determination that the draft code complies with the purposes of the Act, is clearly written and affected persons have been consulted. This latter requirement may, in some cases, involve a targeted preconsultation with affected persons prior to public consultation. When NAWAC is satisfied that all these criteria have been met, the draft of the code will be released for public consultation, with the release publically notified and submissions invited.
- *Public consultation, the analysis of submissions and NAWAC's consideration of the submissions.* Public consultation on codes ensures that the range of views held within the community is taken into account.
- In exceptional circumstances having regard to the feasibility, practicality and economic effects of changing from current to new practices, and the requirements of religious and cultural practices NAWAC may recommend minimum standards that do not comply with the general requirements of the Act (see section 73(3));
- NAWAC may undertake a second consultation process, giving interested groups an opportunity to comment on any proposed changes to the draft and/or to present any new information.
- Submission of the draft code and report on the code to the Minister. As required by the Act, NAWAC will take into account good practice and scientific knowledge, available technology, public submissions and any other relevant matters before recommending the code to the minister. The code report sets out the reasons for the recommendation and the nature of any significant differences of opinion.

The Minister may make any changes to the code, issue it by a notice in the *Gazette*, refer it back to NAWAC or decline to issue it.

#### 3.2 New codes of welfare

The only new code released during 2013 was the llamas and alpacas code. Other codes in various stages of development include:

- Temporary housing of companion animals (including boarding establishments);
- Salevards:
- · Animals in public display, exhibition and entertainment.

#### 3.3 Codes of welfare recommended to the Minister

Rodeos

#### 3.4 Codes in post-consultation process

- · Horses and Donkeys
- Dairy Housing (an amendment to the dairy cattle code)

#### 3.5 Code amendments

An amendment to the layer hens code was released in December.

#### 3.6 Codes of recommendations and minimum standards

The AWAC (Animal Welfare Advisory Committee – the predecessor to NAWAC) codes of recommendations and minimum standards remain as voluntary codes. These codes are progressively being reviewed and replaced by codes of welfare. Where a code of welfare has been issued, it supersedes any information that may be contained in the corresponding code of recommendations and minimum standards. Those codes of recommendations and minimum standards which have yet to be reviewed are listed in Appendix 1.

#### 3.7 Publication and availability

Published codes are available from MPI. A number of copies are issued free of charge to groups affected by the code and to key organisations (for example, the Royal New Zealand SPCA, Federated Farmers of New Zealand and the New Zealand Veterinary Association). See Appendix 1 for a full list of published codes of welfare and codes of recommendations and minimum standards.

Codes are available from:

Animal Welfare Standards Ministry for Primary Industries PO Box 2526 Wellington 6140 New Zealand

Telephone 04 894 0328

Facsimile 04 894 0733

Email animalwelfare@mpi.govt.nz

A charge may be made for bulk orders. Codes are not protected by copyright and may be photocopied. All codes, including all new codes when they are issued, are available on the internet at:

http://www.biosecurity.govt.nz/regs/animal-welfare/stds/codes

# 4 Other Issues for the Year

#### 4.1 Review of layer hens code timeline

While the layer hens code was released by the Minister in December 2012, concerns raised by the Egg Producers Federation (EPF) about the feasibility of meeting the required deadlines for the phase out of cage systems, citing variability in timeframes for resource consent, led to a committee decision to seek advice on the validity of the EPF's concerns. The review by a consultant confirmed that it would be very challenging for many operators to make the transition away from cages on time. In the light of this finding, NAWAC released a discussion document for public consultation that would shift the transition timeline back two years without changing the final deadline of 2022. Following analysis of the submissions, the committee reached agreement that the 2-year option as described in the discussion document should be implemented.

#### 4.2 Dairy housing discussion

A preliminary amendment to the dairy cattle code that covered welfare issues arising out of the long-term housing of dairy cattle was drafted and sent out for targeted consultation at the end of 2012. Submitters were invited to be represented on a writing group which refined the amendment – this latter was sent out for public consultation at the end of 2013.

#### 4.3 Animal Welfare Amendment Bill

Work continued all year on the Animal Welfare Amendment Bill, with a written submission covering a number of issues including NAWAC's proposed function of advising on regulations, as well as measures to increase the committee's efficiency. In October, the Chair attended the Primary Production Select Committee hearings to speak in support of NAWAC's written submission. NAWAC received updates from MPI on the status of the Act review at all its meetings in 2013.

#### 4.4 Consolidation of the use of animals in public display, entertainment and exhibition into one code

With the codes of welfare for zoos and circuses due for review, NAWAC formed a subcommittee in 2012 to look at the possibility of producing a consolidated code that would cover all uses of animals for public display, entertainment and exhibition. This work is ongoing, with many committee members visiting zoos and aquaria during the year (see 2.8.2).

# 4.5 Submission to the Environmental Protection Agency (EPA) on welfare requirements for exotic species

NAWAC made written and oral submissions on the controls proposed by the EPA under the Hazardous Substances and New Organisms Act for the containment of new organisms in zoos, expressing concerns that the lack of coordination between the requirements of the HSNO and Animal Welfare Acts creates an ongoing risk to animal welfare. NAWAC submitted that the controls need to provide a clearer direction on how this coordination is to be achieved.

#### 4.6 Welfare issues related to greyhound racing

The Chair responded to a request for advice from the Government Administration Select Committee on welfare issues in greyhound racing, highlighting the two generic welfare issues that apply to many aspects

of animal use in sporting activities that are relevant to a petition before the Committee: overbreeding and euthanasia of unwanted animals considered of limited usefulness to the activity, and the risk of injury to the animals arising from the use. General greyhound welfare issues are being considered within the animals in public display, exhibition and entertainment code development.

## 5 Research

One of NAWAC's statutory functions is to identify areas where animal welfare research is needed. It periodically identifies priority research areas in consultation with stakeholders and to tie in with the code of welfare development programme and strategic issues that are likely to impact on animal welfare in the future. Priorities identified in the last review include:

- the wider use of pain relief when undertaking painful husbandry procedures;
- aggression in sows, especially following mating, and ways to manage it through feeding and housing systems, genetic improvement and stockmanship; and
- objective assessment of animal welfare outcomes including determining the key measures, monitoring animals, and assessing compliance and performance.

NAWAC actively encourages funding for identified priority topics, some of which are already being addressed through operational research funding, the Sustainable Farming Fund (see http://www.mpi.govt.nz/agriculture/funding-programmes/sustainable-farming-fund.aspx) and industry initiatives.

#### 5.1 Operational research

MPI commissions operational research in areas where there is a lack of suitable information to underpin government activities, policies and standards. Since 1993, more than 100 animal welfare research projects have been funded (see previous NAWAC annual reports).

The following projects were underway in 2013, with final reports due in 2014:

- Massey University Indicators of good welfare in horses
- Massey University Survey of the causes of recumbency in cattle on arrival at slaughter
- Massey University Review of animal welfare indicators for pastoral species.

Reports for all recent research are available at http://www.mpi.govt.nz/news-resources/publications. Reports from prior to 2012 are available at http://www.biosecurity.govt.nz/about-us/our-publications/technical-papers or on request from animalwelfare@mpi.govt.nz

# 6 Communications

#### **6.1 The Minister**

The Chair met with the Minister for Primary Industries Hon Nathan Guy three times during 2013 to discuss NAWAC activities including:

- NAWAC's work programme;
- progress on codes of welfare;
- the Animal Welfare Amendment Bill; and
- · animal welfare in emergencies.

#### 6.2 Welfare Pulse

The MPI publication, *Welfare Pulse*, incorporating codes of welfare updates was published four times in 2013. Articles on NAWAC activities included:

- Special interests in animal welfare NZVA special interest branches (V. Williams, March)
- Breeding sheep with short tails (D. Scobie, June)
- The future of animal welfare in New Zealand (J. Hellström, June)
- Overweight dogs is it that we can't help ourselves? (K. Phillips, September)
- Countdown to the prohibition of glueboard traps for rodents (P. Fisher, September)
- Focus on animal welfare at Massey celebrations (V. Williams, September)
- Using animals for entertainment and recreation: should they be cared for according to higher standards of welfare? (N. Cross, December)
- Sustainable intensification an oxymoron? (J. Hellström, December)

Welfare Pulse is available on line at http://www.biosecurity.govt.nz/regs/animal-welfare/pulse/welfare-pulse

#### 6.3 Conferences

NAWAC members, and members of NAWAC's secretariat and support staff, attended – and in many cases gave presentations at – the following conferences and meetings in 2013:

- RSPCA Scientific Seminar "When Coping is Not Enough", Canberra, February
- 8th International Sheep Veterinary Congress, Rotorua, February
- World Small Animal Veterinary Association Congress, Auckland, February
- World Small Animal Veterinary Association Global Pain Council, Auckland, February
- MPI Animal Welfare Inspectors training, Auckland, April
- Zoo and Aquarium Association New Zealand Conference, Dunedin, May
- New Zealand Pork Conference, Wellington, July
- New Zealand Veterinary Association Conference, Palmerston North, July
- Australia and New Zealand College of Veterinary Scientists Science Week, Gold Coast, July
- · New Zealand Biosecurity Institute Education and Training Seminar, Greymouth, July
- New Zealand Society of Animal Production Conference, Hamilton, July
- Animal Welfare Research, Development & Extension Strategy Forum, Adelaide, August
- Regional Animal Welfare Strategy Coordination Group Meeting 6, Seoul, August
- Seminar for OIE National Focal Points for Animal Welfare, Seoul, August
- Commonwealth Veterinary Association Conference, Fiji, September
- · International Society for Applied Ethology Australasia and Africa Regional meeting, Hamilton, October
- MPI Animal Welfare Inspectors training, Wellington, October
- New Zealand Companion Animal Council Conference, Auckland, October

 University of British Columbia Animals in Research: Openness, Democratic Decision-Making and Public Engagement, Vancouver, November.

#### 6.4 Liaison with other bodies

#### **6.4.1 National Animal Ethics Advisory Committee**

NAEAC deals with ethical and animal welfare issues with regard to research, testing and teaching involving animals. NAWAC continues to maintain a close association with NAEAC, ensuring familiarity with the activities of the two committees (the chairperson of NAEAC is an ex officio member of NAWAC).

#### 6.4.2 Others

Throughout the year one or more NAWAC members, or officers of MPI Animal Welfare Standards acting on behalf of NAWAC, also liaised with a wide network of organisations, including government departments, NGOs, industry, private researchers and companies, to ensure that NAWAC had up-to-date information to enhance its decision making.

# 7 Strategic and Operational Plans

Following a strategic planning exercise in 2011, NAWAC updated its Strategic Plan for the years through to 2015. The Committee's seven strategic priorities are:

- the review of the Animal Welfare Act 1999;
- ensuring the Minister gets a societal view of animal welfare issues and priorities;
- · monitoring trends and results;
- ensuring transparency of NAWAC's processes to underpin its independence;
- the welfare implications of new and emerging technologies and devices;
- ensuring a balanced decision-making process for committee decisions;
- demonstration of national and international leadership in animal welfare.

During the year the Committee reviewed its strategic plan and identified a number of priority areas that it felt were not being adequately considered. These were animal welfare issues associated with breeding and the provision of shade and shelter, as well as consideration of wildlife welfare. As a result, subcommittees have been established to determine how significant these issues are and how they might be addressed.

# Appendix 1

## **Published codes**

Codes of Welfare	Publication year
Commercial Slaughter	2010
Companion Cats	2007
Circuses	2005
Dairy Cattle	2010
Deer	2007
Dogs	2010
Goats	2012
Layer Hens	2012
Llamas and Alpacas	2013
Meat Chickens	2012
Painful Husbandry Procedures	2005
Pigs	2010
Rodeos	2003
Sheep and Beef Cattle	2010
Transport of Animals within New Zealand	2011
Zoos	2005
Codes of Recommendations and Minimum Standards	
Care of Animals in Boarding Establishments	1993
Emergency Slaughter of Farm Livestock	1996
Sale of Companion Animals	1994
Sea Transport of Sheep from New Zealand	1991
Welfare of Animals at Saleyards	1995
Welfare of Deer During the Removal of Antlers (amended in 1994 and 1997)	1992
Welfare of Horses	1993
Welfare of Ostrich and Emu	1998

# Appendix 2

# Other publications

Guidelines	Publication date
Welfare of Livestock from which Blood is Harvested for Commercial and Research Purposes (NAEAC guideline)	March 2009
Welfare of Red and Wapiti Yearling Stags During the Use of Rubber Rings to Induce Analgesia for the Removal of Spiker Velvet (AWAC guideline)	September 1998
Welfare of Yearling Fallow Deer During the Use of Rubber Rings to Prevent Antler/Pedicle Growth (AWAC guideline)	September 1997
MPI Policy Guides to the Animal Welfare Act	
Guide to the Animal Welfare Act 1999	December 1999
Guidelines for Writing Codes of Welfare	June 2009
The Use of Animals in Research, Testing and Teaching – Users Guide to Part 6 of the Animal Welfare Act 1999	May 2000

## **NAWAC Guidelines**

No.	Title	
1	Approach to the consideration of draft codes of welfare	Revised July 2011
2	Dealing with practices which might be inconsistent with the spirit of the Animal Welfare Act	Revised July 2011
3	Setting minimum standards where section 73(3) applies	Revised July 2011
4	Process for the development of codes of welfare	Revised July 2011
5	Role of science in setting animal welfare standards	Revised July 2011
6	Wider issues relevant to setting minimum standards	Revised July 2011
7	Taking account of societal expectations, technical viewpoints and	
	public opinion	Revised July 2011
8	Justifying animal welfare trade-offs	Revised July 2011
9	Assessing the welfare performance of restraining and kill traps	Revised October 2011
10	Phasing out one animal management system in favour of another	September 2005
11	Principles of consultation	February 2006