**Submission to NAWAC on the draft Deer Code of Welfare 2022**

**Submission made by:** <Insert name and position, e.g. chair, here>

**Contact details:** <Insert phone/email here>

**Introduction**

<insert I/We> thank the National Animal Welfare Advisory Committee (NAWAC) for the opportunity to submit its views on the draft Deer Code of Welfare 2022. <insert brief background of you and your connection to the deer industry>. <insert I/We> hope that NAWAC will accept these comments in good faith and act on them accordingly.

Overall, <insert I/we> support the current draft of the code and believes that if it is released with the amendments suggested here, then it will be a valuable resource for ensuring good deer welfare, now and into the future.

For information, in the following submission, if a minimum standard is not mentioned, this means that <insert I/we> agree with it as drafted.

**Comments**

*Minimum Standard 6 – Mixing of Deer*

<insert I/We> are concerned by the blanket requirement to provide ‘sufficient environmental complexity’, to allow deer to escape aggression (std 6b). Deer are highly mobile animals and in the <insert my/our> view, space is a more important factor than environmental complexity. In addition, <insert I/we> note that there are some areas of the country, where deer are farmed on flat land and in these cases, it will be extremely difficult to comply with the proposed standard.

<insert I/We> therefore request that NAWAC remove the requirement for ‘sufficient environmental complexity’ and allow farmers to focus on providing ample space for mixed deer, which is what they already do.

<insert I/We> are also concerned by the requirement to introduce a persistently bullied animal to a new mob (std 6d), as this would likely have the opposite intent to what is intended, i.e. the introduced animal would be subject to further bullying, due to it being an unfamiliar individual – its place in the new dominance hierarchy would have to be established all over again.

Rather than make this a minimum standard, <insert I/we> would suggest that it becomes a recommended best practice. This would enable it to be used as an option, noting that in most cases, a persistently bullied animal would be more likely to be culled, to reduce further suffering.

*Minimum Standard 7 – Feed*

<insert I/We> would strongly advise that NAWAC sets the body condition score for remedial action to ‘below 2’, rather than ‘2 or below’ (std 7c). In the evaluation report accompanying the draft code, the difficulties in accurately assessing body condition without manual palpation are highlighted and this is a very practical issue for us. In practice, the majority of deer farmers will be taking remedial action before a deer reaches condition score 2, however, we are concerned that famers may be unfairly penalised under the Code on the basis of differences in opinion over whether or not an animal is above, at or below condition score 2.

Minimum standard 7h, requires automated feeding systems to be monitored daily. At this point in time, this type of system is not common and is only used as a supplementary option, i.e. it is not the only source of food for the deer. <insert I/We> would like to see this either moved into a recommended best practice or for an example indicator to be included in the Code, providing clarification that monitoring can include automated alarm systems, e.g. text alerts, when something is wrong.

*Minimum Standard 8 – Water*

The same outcome as above is requested for minimum standard 8e (automated water systems). In addition, <insert I/we> are concerned by the proposed regulation for water access during winter grazing. While the <insert I/we> support the intent of the regulation, it is important to note that winter grazing in deer is done differently to other livestock, in that deer are not normally back fenced. This means that they are free to move around the paddock to and from the available water sources. In addition, stock exclusion requirements and other restrictions on the placement of water systems, may make this difficult for some deer farmers to comply with. <insert I/We> therefore request that a flexible approach to the provision of water for animals being winter grazed is taken during the development of the regulations and that the deer industry is given the opportunity to comment further on them before they are finalised.

*Minimum Standard 10 – Farm Facilities, Equipment and Technologies*

<insert I/We> would like clarification in the final version of the Code, that the evacuation requirement in minimum standard 10a(iv) applies to deer, to avoid ambiguity.

*Minimum Standard 11 – Managing Deer in Off-Paddock Facilities*

<insert I/We> would recommend that NAWAC go back to the wording of the original Code for the standard on lighting (std 11d), as this would allow for variation in natural light, which may, on occasion, drop below the proposed 50 lux minimum. Most modern wintering facilities are either open sided or of the ‘poly tunnel’ design, so rely solely on natural light, which means retrofitting lighting systems to them will be both costly and impractical. Older, barn style systems, on the other hand, already have artificial lighting installed, so can manage the light intensity requirement in this way.

We are also concerned by the 15-ppm ammonia requirement (std 11f). While deer are unlikely to breach this, due to the well-ventilated nature of the housing systems used and fact that deer produce minimal amounts of liquid effluent compared to cattle, we see this as the thin end of the wedge and would propose a compromise to 20-ppm, from the current 25-ppm, which is both achievable and fair.

*Minimum Standard 12 – Identification*

Although ear marking (std 12b) is not widely practiced in the deer industry, it is nonetheless an extremely valuable tool used by some farmers to discourage deer poaching. <insert I/We> are strongly of the view that ear marking should be retained as an option. Therefore, <insert I/we> would suggest that the standard is either moved into a recommended best practice, or else clarified to allow its limited use where poaching is an issue.

*Minimum Standard 14 – Mating, Semen Collection and Reproductive Technologies*

Given that electroejaculation is the only method that works for artificially collecting semen in deer and that the number of animals that receive the treatment is exceptionally small in comparison to the total number of farmed stags, <insert I/we> would like to see the maximum number of electroejaculation sequences increased to two, until such time that the welfare impacts of the procedure are better understood.

*Minimum Standard 17 – Fawning*

Minimum Standard 17b requires a fawn to be in the normal position for delivery *before* manual assistance can be given. However, in the vast majority of cases, the hand needs to be inserted in order to determine if the fawn is in the correct position. <insert I/We> are concerned that the standard would not allow this initial assessment to take place and would suggest that it is either moved to a recommended best practice, or reworded to clarify that diagnosis includes the normal physical examination to occur.

*Minimum Standard 17 – Weaning*

In <insert my/our> view, the requirement to wean fawns at not less than twelve weeks of age (std 17a) is impractical, both from the perspective of ensuring maternal welfare and because of its potential impact on pre-rut weaning, which is a relatively common practice. Where late fawning occurs, which due to natural mating, is beyond the farmer’s control, pre-rut weaning becomes impossible within the timeframe specified by the standard. As a compromise, <insert I/we> would like to see the minimum standard reduced to eight weeks, with twelve weeks adopted as a recommended best practice.

*Minimum Standard 22 – Pre-transport selection and Management*

<insert I/We> have serious concerns over the proposed minimum standard.

First of all, preventing hinds and fawns weaned for less than ten days from being transported (std 22f), will have a major impact on the industry. The DeerQA transport programme allows transport of deer at weaning, from farm to farm only, with a maximum total duration (from the start of yarding until unloading) of six hours. <insert I/We> would strongly urge NAWAC to adopt this standard instead of what is proposed. The DeerQA Transport programme does prohibit the transport of unweaned deer or those that have been weaned for less than ten days to auction or saleyards. <insert I/We> agree with this and recommend that minimum standard 22 (f) is changed accordingly. <insert I/We> would also support moving minimum standard 22(f), as currently worded, into a recommended best practice.

Second, <insert I/we> oppose minimum standard 22 (g), on the grounds that it would effectively stop the transport of high-value stud animals and make the transport of small numbers of deer to slaughter impractical for many farmers.

Given the practical considerations and increasing financial pressure on many deer farmers, until the scale of the problem (if any) and causes are known, <insert I/we> are of the opinion that this standard should be removed.

Finally, the <insert I/we> are concerned that the requirement for water to be available at all times before transport (std 22i) means that every pen must have a water supply. If this is the case, then the standard will be unworkable, as the design of deer pens simply does not allow for water to be provided in every single pen. In practice, deer do have access to water in the deer yard (as distinct from the pen), which is where they are held until being moved into pens just before loading. <insert I/We> request that NAWAC clarifies this standard and recognises the distinction between holding deer in the yard and in pens.

*Minimum Standard 24 – Disease and Injury Control*

<insert I/We> take issue with the requirement for there to be an animal health plan that is regularly reviewed and signed off by a veterinarian (std 24h). Compared to many other species, deer do not suffer from many health issues, which means that the standard places an additional and unnecessary financial burden on farmers. However, <insert I/we> are not fundamentally opposed to the idea of an animal health plan in principle, but would suggest that it becomes a recommended best practice, with the requirement for review by an animal health advisor, to give farmers more flexibility about how they choose to manage the health of their deer.

**Conclusion**

Once again, <insert I/we> would like to thank NAWAC for the opportunity to make a submission on the draft Deer Code of Welfare 2022. While some of our recommendations may seem at odds with what NAWAC is proposing, we have approached this task with the welfare of our animals at heart and firmly believe that as the ones who work with deer day in and day out, we are in an ideal position to comment on what is needed to ensure their wellbeing.

As previously mentioned, with the exception of the above comments, <insert I/we am/are> comfortable with the rest of the Code and looks forward to seeing the final version, with <insert my/our> suggestions taken on board.

Please do not hesitate to contact <insert me/us> if there is anything you wish to discuss in relation to this submission.

Regards,

<Insert name here>